South Carolina FCC Certification Renewal and Supporting Documents

Introduction

The State of South Carolina Office of Regulatory Staff (ORS) has prepared this narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, particularly in response to the **FCC Public Notice DA 07-2761, CG Docket No. 03-123** released on June 22, 2007. Included in the Public Notice are the minimum mandatory FCC TRS requirements under 47 C.F.R. **§64.604 and §64.605.** A copy of this Public Notice and these mandatory requirements is attached as Appendix A. ORS prepared this TRS Certification Renewal Application with the assistance of Sprint Relay.

The ORS was created with the enactment of Act 175 of 2004. The ORS is responsible for many of the non-adjudicative functions associated with utility regulation that formerly fell under the auspices of the S.C. Public Service Commission (SCPSC). Prior to January 1, 2005, the SCPSC handled all aspects of administration of the statewide TRS program. The SCPSC established a contract for Telecommunications Relay Service with Sprint effective March 29, 2002, to provide all operational, technical, and functional standards of TRS.

Please note that although Sprint Relay Internet Protocol (IP) and Video Relay Services (VRS) information is listed throughout this document, ORS does not contract to provide these services in South Carolina, nor is ORS responsible for oversight of IP and VRS services.

The FCC has requested that each FCC TRS Certification Renewal application responds to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

The Appendices included with this TRS Certification Renewal Application are as follows:

A. Copy of the Public Notice DA 07-2761
B. TRS, CapTel, STS, IP, VRS Training Outlines
C. TRS, IP, VRS and CapTel Pledge of Confidentiality
D. E911 Call Procedure
E. Sprint Carrier of Choice Letter of Invitation
F. Sprint Outage Prevention Program
G. Sprint Disaster Recovery Plan
H. Sprint TRS Standard Features Matrix
I. Sprint Policy on 10 and 15 minute Rule
J. FCC TRS Mandatory Minimum Standards & Compliance Matrix
K. FCC CapTel Mandatory Minimum Standards & Compliance Matrix
L. Sprint's Report to the FCC on VRS and IP Waivers
M. Sprint Relay Fact Sheet
N. Sprint TSP Press Release
O. Copy of Annual Report
P. Copy of Relay Brochure
Q. State Legislation Establishing TRS program in SC
R. Copies of Complaint Logs
S. Copy of SCPSC Order approving current surcharge rate

Table of Contents

South Carolina FCC Certification Renewal and Supporting Documents

Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

ORS contracts with Sprint to provide the hiring, training and oversight of Communication Assistants for ORS. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

IP (Internet Relay) CAs follow the same employment and training standards as TRS CAs. In addition, Sprint provides an enhanced VCO service called Captioned Telephone (*CapTel*) Services. Sprint requires that all *CapTel* CAs have a high school graduate equivalency as a minimum qualification for the job.

All Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Communication Assistants Training Program

Sprint trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. Sprint works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. Sprint utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech (STS), CapTel and Video Relay Service (VRS) Training outlines in Appendix B.

A team of ASL-Fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the *CapTel* Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by *CapTel* management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminated from employment.

All *CapTel* CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. *CapTel* CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call; therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

1.1 The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.

1.2 The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.

1.3 The CA shall be required to meet the FCC standards for TRS minimum transcription speed.

1.4 The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.

1.5 The CA shall pass along a *CapTel* caller's Automatic Number Identification (ANI) to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.

1.6 Personnel supporting *CapTel* will have the requisite experience, expertise, skills, knowledge and training and education to perform *CapTel* Services in a professional manner.

Please review the Sprint TRS, STS, *CapTel* and Video Relay Service (VRS) Training outlines in Appendix B for more information on CA training requirements.

CA Quality Assurance Programs

Monthly Surveys

Sprint Relay conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for TRS CAs as well as IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and South Carolina contractual commitments, Sprint centers and or an independent third party quality testing firm has been retained by Sprint to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Sprint Relay also conducts test calls to ensure *CapTel* quality at least once a quarter, but often conducts monthly tests of 100 test calls on *CapTel*.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

Sprint Relay and the Relay Program Management team also perform test calls for *CapTel* CAs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

All CAs type a minimum of 60 words per minute (WPM). Sprint Relay utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60

WPM performance requirement is maintained. During this test, Sprint Relay does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call centers. This applies to IP and IP wireless relay CAs as well.

Sprint Relay utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

CapTel's voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all *CapTel* CAs.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

All Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

ORS requires all CAs, including IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix B, Module 4I, and the Video Relay Service Training Outline and Qualifications. CapTel CAs also stay on all calls for a minimum of 10 minutes.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

When a relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a VRS and IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of Video Interpreter (VI) is necessary during the call, every attempt will be made to accommodate the previous gender request.

CapTel CAs are waived from this requirement. See Appendix K, FCC *CapTel* Mandatory Minimum Standards & Compliance Matrix.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

CAs transmit and relay all conversations between the caller and the called parties in real time.

CapTel is a transparent service. CAs transmit audio and captioned text conversations from the voice caller to the *CapTel* user in real time. Since the *CapTel* user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

As stated earlier, ORS contracts with Sprint Relay to oversee all TRS CAs, including *CapTel* CAs for the state of South Carolina. Sprint Relay believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and VIs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Sprint Relay's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigations and screening.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.

- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Appendix C for the TRS Pledge of Confidentiality. This document is similar to what is used for VRS interpreters and IP/IP Wireless CAs.

CapTel Captioners must comply with the same rules that TRS follows regarding confidentiality. The *CapTel* confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to *Captel* Captioners. A copy of the *CapTel* confidentiality form signed by *CapTel* CAs can be found under Appendix C.

Information obtained during a *CapTel* call should not be shared with any person except a member of the *CapTel* management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, *CapTel* in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may have problems, complaints or stress from handling the call. The Captionist may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of *CapTel* depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, CAs will translate written ASL into conversational English. All CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

VRS interpreters, IP/IP Wireless CAs and *CapTel* CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. Relay users have full control of all of their relay calls.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

South Carolina Telecommunications Relay Services

Relay South Carolina provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. Relay South Carolina also processes calls to directory

assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Relay South Carolina retain full control of the length and number of calls placed anytime through relay. IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services.

CapTel CAs are currently waived for outbound calls because the *CapTel* CA is not involved in the call set up and cannot refuse the call *CapTel* users dial sequential calls directly therefore it is not possible for a *CapTel* CA to refuse sequential calls or limit length of calls.

CapTel CAs are not waived by the FCC for inbound calls to a *CapTel* user made through a TRS facility. However, if a call is made directly to the captioned telephone access number no set up is involved and the *CapTel* CA cannot refuse to call. Please see Appendix K for more information on these waivers.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv)Relay services shall be capable of handling pay-per-call calls.

Relay South Carolina, through Sprint, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Relay South Carolina will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS or *CapTel* call is placed through Relay South Carolina, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls, and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Sprint gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Sprint will process calling cards offered by the user's carrier of choice if the carrier is a participant of Sprint's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. Sprint works with the LECs and IXCs to compile and make available to all TTY or *CapTel* users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Relay South Carolina provides access to all available relay call types. A complete list of all call types may be found in Appendix H Sprint TRS Standard Features Matrix. Most call types are waived by the FCC for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

Except where waived by the FCC, *Captel* users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a *CapTel* phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first. With 2-Line *CapTel* service, a *CapTel* user can release or receive captions at any time during a call.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to CAs, instead of the entire 10-digit number. The *CapTel* Consumer Premises Equipment (CPE, or *CapTel* phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay South Carolina. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to Relay South Carolina and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

CapTel users are also able to participate in a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or "flash") button on his or her CPE. Thus, *CapTel* meets the requirement for three-way calling for users of One-Line *CapTel.* For Two-Line *CapTel*, either party can initiate a three- way call should the user purchased this as a LEC option. *CapTel* users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's

terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

When a Relay South Carolina caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, Relay South Carolina callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using an Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu.   The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

Callers to Relay South Carolina access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. The Relay South Carolina current 900 number is 900-535-3323.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Relay South Carolina TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix H, Sprint TRS Standard Features Matrix.

Answering Machine

CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes Sprint's recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the relay user to leave a message if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. Sprint has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

<div align="center">

(UR MSG LEFT) CA XXXXM/F GA

</div>

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. CapTel CAs are also equipped with the ability to retrieve messages stored on a local answering machine.

Voicemail Retrieval

Sprint has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. The *CapTel* user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The *CapTel* user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The *CapTel* user interacts with the recorded message system directly. This is treated as one call.

A.4 Handling of Emergency Calls

§64.604(a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Relay South Carolina meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, Sprint's intelligent CA application utilizes the NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

Relay South Carolina considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. Sprint utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay South Carolina, the CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is ORS's and Sprint's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, Sprint will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or

- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. ORS and Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If user tell operator to dial 911, operator will request supervisor assistance. User will need to provide the address and city where he/she is calling from. Supervisor will call Directory Assistance (on separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make outbound call to 911 dispatcher (PSAP). It can take few minutes or so to get the information. Users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing.

More information about Sprint's procedure for handling E911 calls, including *CapTel* calls, may be found in Appendix D.

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)

- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, NJ)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay South Carolina users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix N for a copy of the general press release regarding the TSP program.

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Relay South Carolina's customer database is available to Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the Sprint relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the Relay South Carolina's Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, Video Relay and *CapTel* services.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Each CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection. Currently, ASCII and Baudot requirements are waived for *CapTel* services. For more information about *CapTel* waivers, see Appendix K.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Relay South Carolina, through Sprint Relay, has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. Sprint has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Relay South Carolina meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Sprint Centers that serve South Carolina are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the South Carolina call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the Sprint network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short- and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless, VRS and *CapTel* calls. Sprint *CapTel* ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of–answer calculation. Sprint *CapTel* system is designed to a P.01 standard or greater measured on a daily basis.

§64.604 (b) (2) (ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Relay South Carolina, through Sprint Relay, has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) Sprint samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint currently samples every 15 minutes.

Relay South Carolina is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Relay South Carolina, through Sprint Relay, will continue to answer 85% of all relay calls within 10 seconds. There will be no more the 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

Sprint begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not to be placed in a queue or on hold after reaching the Relay switch.

Service Level calculation for TRS

Sprint's Service Level calculation for all TRS calls, excluding *CapTel*, is described below:

Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned),

(SVL = Number of calls handled in < 10 / Number of calls offered).

Service Level Calculation for CapTel

For *CapTel* users, the number of calls that arrive at the *CapTel* call center will be the number of Calls Offered.

The number of calls that are answered by a CA is the number of Calls Answered.

The time for each call between the time the call arrives at the *CapTel* call center and the time answered by a CA until it is abandoned is the Speed of Answer.

Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the CapTel user they are calling. This time is subtracted out from the Speed of Answer time.

The total number of calls with the Speed of Answer as 10 seconds or less is the number of Qualifying Calls.

Qualifying Calls divided by Calls Offered = Service Level (x percent of calls answered within 10 seconds).

Weighted Service Level for TRS

Sprint uses a 'weighting' process to combine the results of several Call Centers into a single result:

The 'weighted' service level (SVL) is a calculation that multiplies the number of 'State' calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

Sprint will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the Sprint Relay Center and Sprint will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

Weighted Service Level for CapTel

While *CapTel* operates two *CapTel* call centers, all calls are directed through one Automatic Call Distributor switch. All calls are answered in the order received and is measured, unweighted, by this switch.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Relay South Carolina considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Please see answer to (b)(2)(ii) above.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Please see answer to (b)(2)(ii) above.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Sufficient transmission facilities have been provided to service all traffic levels, including busy hour peaks. Sprint utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

Sprint ensures no greater than 1% blockage on a daily basis. Sprint offers Relay South Carolina customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, Sprint's network ensures a very low level of call interruption or blockage.

The Sprint network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the Sprint network passes over Inter Machine Trunks (IMT) which are engineered at P.01 Grade of Service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Sprint Relay complies with this requirement. Please refer to Sprint Relay's report to the FCC under Appendix L.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Relay South Carolina provides South Carolina callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the South Carolina Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of Sprint Carrier of Choice program are:

- AT&T Communications
- Bell South Long Distance
- Bestline
- Birch Telecom
- Broadwing Communications
- Broadwing Telecommunications
- Cox Communications
- Excel Telecommunications, Inc.
- Global Crossings Telecommunications
- MCIWorldCom
- McLeod USA
- Qwest Communications
- SBC Communications Long Distance
- Souris River Telecommunications
- Sprint
- Telecomm*USA (MCIWorldCom)
- Touch America Services, Inc.
- U.S. Link
- VarTec dba Clear Choice Communications
- VarTec Telecom, Inc.
- Verizon Long Distance
- Winstar
- Working Assets
- WorldCom
- WorldXChange

If a South Carolina caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix E for a sample of the Carrier of Choice letter sent to carriers when a customer has a preferred interexchange carrier that does not participate in the Sprint COC program.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Sprint TRS and Sprint Relay Customer Service are both available 24 hours a day, every day of the year. Sprint utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless, VRS and *CapTel* Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Relay South Carolina Network Support Plan

Service Reliability

Relay South Carolina, through Sprint's service, is provided through an all-fiber sophisticated management control networks that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to Relay South Carolina customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to South Carolina, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for South Carolina.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new

sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.
- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
- Utilization of established plans to respond effectively to these outages.
- The capability to rapidly deploy network transmission facilities when needed.
- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.
- The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Relay South Carolina, through Sprint Relay, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for Videophone users).

On 31 July 2006, Sprint launched **MySprintVRS number.** This **MySprintVRS Number** feature empowers Deaf and hard of hearing Video Relay Service (VRS) users with a simply means of receiving incoming calls With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. *Sprint VRS Mail for wireless devices* is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM.

Sprint also provides *CapTel* services, which is recognized as an enhanced VCO service.

For more information on technology provided through Sprint Relay, please refer to Appendix M: Sprint Relay Fact Sheet.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Relay South Carolina, through Sprint Relay, offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is a received, Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Sprint provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to ORS. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

By June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to ORS.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS

provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Relay South Carolina callers may file intrastate commendations and complaints regarding Relay South Carolina services through the following contact:

Dawn Hipp, Telecommunication Programs Manager
State of South Carolina Office of Regulatory Staff
1441 Main Street
Columbia, SC 29201
Customer Service Toll-Free Voice: 1-800-922-1531
Customer Service Toll-Free TTY: 1-800-334-2217
Customer Service Fax: 1-803-737-4750
E-Mail: dhipp@regstaff.sc.gov

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

ORS, through Sprint Relay, is committed to providing a comprehensive outreach program on all Relay South Carolina services. Each year $100,000 is designated towards ensuring that South Carolina citizens are provided information regarding Relay South Carolina. Relay South Carolina awareness programs implemented by Sprint include:

- Updated website
- Comprehensive brochures identifying all type of relay services
- Statewide Public Service Announcement campaign using television and radio
- Advertisements and articles in regional newsletters and newspapers
- Distribution of promotional giveaways and public education brochures at various events, non-profit forums and professional conferences for all segments of the population (Sample of Relay South Carolina brochure can be found in Appendix P)
- Training opportunities for relay users on new technology

The South Carolina Public Service Commission (SCPSC) mandates a seven member TRS Advisory Committee provide input on efforts to expand outreach to South Carolina Relay users.

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

South Carolina users are charged no more for services than for those charges paid by standard "voice" telephone users. South Carolina users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the South Carolina COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All South Carolina relay intrastate and interstate minutes are reported separately and distinctly to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA)

would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

Statewide TRS services were established by the South Carolina Legislature under S.C. Code Laws § 58-9-2520 to provide all South Carolina residents telecommunications access. The Legislature established a Dual Party Fund to operate the statewide TRS, telecommunications equipment distribution program (TEDP) and other related telecommunications access programs. The current surcharge rate is $0.15 per line and the surcharge is reviewed and adjusted annually by the SCPSC. S.C. Code Laws § 58-9-2520 is included in Appendix Q.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Relay South Carolina, through Sprint, has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

Sprint will provide copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to ORS. Further, Sprint maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the Sprint States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. South Carolina customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the South Carolina Relay Program Manager to file complaints or commendations.

Sprint has the capability to transfer the caller on-line to the Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay web sites.

Relay South Carolina submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline.

ORS has adopted the informal FCC procedure of closing all customer complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed with the ORS. Complaint Log Summaries filed by the ORS are attached as Appendix Q.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Relay South Carolina uses the Sprint Customer Preference Database which includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract, Sprint will transfer all South Carolina database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

(a) (1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state

program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

Relay South Carolina does not provide Video Relay Services or Internet Relay services for the state of South Carolina. Although there are references to Sprint Relay IP and Sprint Relay VRS services, ORS does not contract to provide these services, nor does ORS oversee these services for the state of South Carolina.

 (f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

ORS had two substantive changes in the past three years. These changes were to update contact information for South Carolina. Both changes were communicated to the FCC via e-mail.

Appendix A

FCC TRS Public Notice, June 22, 2007

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 07-2761
June 22, 2007

CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS STATES THAT CURRENT TELECOMMUNICATION RELAY SERVICE (TRS) CERTIFICATION WILL EXPIRE ON JULY 26, 2008, AND PROVIDES A TIMELINE FOR SEEKING RECERTIFICATION

CG Docket No. 03-123

The current TRS certifications for all states and territories will expire on July 26, 2008. Under the TRS regulations, states can apply for "renewal" one year prior to expiration, *i.e.,* July 26, 2007. 47 C.F.R. § 64.605(c).

BACKGROUND

TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with voice telephone users. Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934. 47 U.S.C. § 225. Under the statute, TRS services are intended to be functionally equivalent to voice telephone service. The TRS regulations set forth mandatory minimum standards that TRS providers must follow in offering service, and are intended to ensure that TRS meets the functional equivalency mandate. *See* 47 C.F.R. §64.604 (set forth in the attached Appendix).

Because the states have primary responsibility for the oversight and compensation of intrastate TRS, the regulations also set forth the process by which state TRS programs may be certified. 47 C.F.R. § 64.605; *see also* 47 U.S.C. §§ 225(c) & (d)(3)(B). The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The relevant sections of § 64.605 are set forth in the Appendix.

APPLICATIONS FOR CERTIFICATION:

Applications for certification (or renewal of certification) may be filed with the Commission beginning July 26, 2007. All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech (STS) service. If a state program also offers Internet Protocol (IP) Relay, Video Relay Service (VRS), Captioned Telephone Service, or IP Captioned Telephone Service, the state must also demonstrate that it provides these services consistent with the rules.

Although there is no deadline for filing, renewal applications should be filed by October 1, 2007, to give the Commission time to review and rule on the applications prior to the expiration of the prior certification.

Applications for certification are reviewed to determine whether the state TRS program has sufficiently documented that it meets all of the applicable mandatory minimum standards set forth in Section 64.604. If the program exceeds the mandatory minimum standards, the state must certify that the program does not conflict with federal law.

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123.

Electronic Filers: Filings may be filed electronically using the Internet by accessing the ECFS: http://www.fcc.gov/cgb/ecfs/. Follow the instructions provided on the website for submitting electronic filings.

- For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the filing for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic filing by Internet email. To get filing instructions, filers should send an email to ecfs@fcc.gov, and include the following words in the subject line or body of the message: get form <your email address>. A sample form and directions will be sent in response.

Paper Filers: Parties who choose to submit by paper must submit an original and four copies of each filing on or before October 1, 2007. To expedite the processing of complaint log summaries, states and interstate TRS providers are encouraged to submit an additional copy to Attn: Diane Mason, Federal Communications Commission, Consumer & Governmental Affairs Bureau, 445 12th Street, SW, Room 3-A503, Washington, D.C. 20554 or by email at Diane.Mason@fcc.gov. Parties should also submit electronic disk copies of their certification filing on a standard 3.5 inch diskette or CD-Rom formatted in an IBM compatible format using Word 2003 or compatible software. The electronic media should be submitted in "read-only" mode and must be clearly labeled with the state's name, the filing date and captioned "TRS Certification Application."

Filings can be sent by hand or messenger delivery, by electronic media, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). The Commission's contractor will receive hand-delivered or messenger-delivered paper filings or electronic media for the Commission's Secretary at 236 Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building. Commercial and electronic media sent by overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, SW, Washington, D.C. 20554. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-B204, Washington, D.C. 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE:

DATE	ITEM	FCC ACTION
October, 2007	Public Notices are issued indicating that applications have been received by the Commission and seeking comment	**Public Notices** are released seeking comment on the filing. Comments due within 30 days and then an additional 15 days for reply comments.
September 2007 – May 2008	Applications for TRS recertification are reviewed for compliance with 47 C.F.R. §§ 64.604 & 64.605.	**Deficiency letters** are sent to request additional information that demonstrates compliance with the mandatory minimum requirements.
May - July, 2008	Public Notices informing states that their applications for recertification have been reviewed and certification has been renewed.	**Public Notice**

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, D.C. 20554. Customers may contact BCPI at their web site: www.bcpiweb.com or by calling 1-800-378-3160. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://www.fcc.gov/cgb/ecfs (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: http://www.fcc.gov/cgb/dro.

For further information regarding this *Public Notice*, please contact Diane Mason, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail at **Diane.Mason@fcc.gov**.

APPENDIX

RELEVANT RULES:

§64.604 MANDATORY MINIMUM STANDARDS[1]

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) *Operational standards*—(1) *Communications assistant (CA).* (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

(2) *Confidentiality and conversation content.* (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

(3) *Types of calls.* (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

---

[1] Note that some of these requirements have been waived for certain forms of TRS.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

(iv) Relay services shall be capable of handling pay-per-call calls.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

(4) *Handling of emergency calls.* Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(5) *STS called numbers.* Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

(b) *Technical standards*—(1) *ASCII and Baudot.* TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

(2) *Speed of answer.* (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

(3) *Equal access to interexchange carriers.* TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

(4) *TRS facilities.* (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

(5) *Technology.* No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 *et seq.*

(6) *Caller ID.* When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

(c) *Functional standards*—(1) *Consumer complaint logs.*(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

(2) *Contact persons.* Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

(3) *Public access to information.* Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should

extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

(4) *Rates.* TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

(5) *Jurisdictional separation of costs*—(i) *General.* Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

(ii) *Cost recovery.* Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) *Telecommunications Relay Services Fund.* Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) *Contributions.* Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) *Contribution computations.* Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least $25 per year. Carriers whose annual contributions total less than $1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total $1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) *Data collection from TRS Providers.* TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) *Payments to TRS providers.* TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(*1*) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or

(*2*) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or

(*3*) Interstate common carriers offering TRS pursuant to §64.604; or

(*4*) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with

the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) *Information filed with the administrator.* The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (*See* 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (*See* 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (*See* 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) *Complaints*—(i) *Referral of complaint.* If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

(iii) *Jurisdiction of Commission.* After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(*1*) 180 days after the complaint is filed with such state entity; or

(*2*) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) *Complaint procedures.* Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) *Informal complaints—(1) Form.* An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(*2*) *Content.* An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(*3*) *Service; designation of agents.* The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) *Review and disposition of informal complaints.* (*1*) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(*2*) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) *Formal complaints.* A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(*1*) The name and address of the complainant,

(*2*) The name and address of the defendant against whom the complaint is made,

(*3*) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(*4*) The relief sought.

(D) *Amended complaints.* An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) *Number of copies.* An original and two copies of all pleadings shall be filed.

(F) *Service.* (*1*) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(*2*) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) *Answers to complaints and amended complaints.* Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) *Replies to answers or amended answers.* Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) *Defective pleadings.* Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

(7) *Treatment of TRS customer information.* Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

[65 FR 38436, June 21, 2000, as amended at 65 FR 54804, Sept. 11, 2000; 67 FR 13229, Mar. 21, 2002; 68 FR 50977, Aug. 25, 2003; 69 FR 5719, Feb. 6, 2004; 69 FR 53351, Sept. 1, 2004; 69 FR 55985, Sept. 17, 2004; 69 FR 57231, Sept. 24, 2004; 70 FR 51658, Aug. 31, 2005; 70 FR 76215, Dec. 23, 2005]

§64.605 STATE CERTIFICATION.

(a) *State documentation*—(1) *Certified state program.* Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by

the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

(2) *VRS and IP Relay provider.* Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "VRS and IP Relay Certification Application." The documentation shall include, in narrative form:

(i) A description of the forms of TRS to be provided (*i.e.*, VRS and/or IP Relay);

(ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;

(iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;

(iv) A description of the provider's complaint procedures;

(v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;

(vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;

(vii) Demonstration of status as a common carrier; and

(viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) *Requirements for state certification.* After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) Requirements for VRS and IP Relay Provider FCC Certification. After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

(i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(c)(1) *State certification period.* State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(2) *VRS and IP Relay Provider FCC certification period.* Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(d) *Method of funding.* Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) *Suspension or revocation of state certification.* The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

(2) *Suspension or revocation of VRS and IP Relay Provider FCC certification.* The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(f) *Notification of substantive change.* (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

[70 FR 76215, Dec. 23, 2005]

Appendix B

Sprint TRS, STS, CapTel, and VRS Training Outlines

Sprint TRS Training Outline

Module	Module Description
Module 1	**Orientation** • Objectives • Welcome & History • Future of Sprint • What is Relay? • CA Training • Call Flow Chart
Module 2	**Phone Image** • Objectives • Introduction • Communicating Information • Using Conversational Tone • Managing Dissatisfied Customers
Module 3A	**Overview of System and Equipment** • Objectives • Logging In • Logging Out • Screen Display • Checking for Understanding • Headsets • Modem • Error Correction • Keyboard • Last Typed Macro Feature • English Macros • Spanish Macros • Telephony Terms
Module 3B	**Interactive Terminals** • Knowing Your TTY • Closing a Conversation • Typing Background Noises
Module 3C	**Overview of System and Equipment (FRS Only)** • Malfunctions • Relay Procedures • Confidentiality • Statistics • Handling Obscene Calls • Requesting a Supervisor • Reporting • Macros
Module 4A	**Call Processing Procedures** • Objectives • Your Role as CA • Call Processing for All States
Module 4B	**Destinations of Traffic** • Destinations not Allowed • IntraLata Competition • State Differences

Module	Module Description
Module 4C	**Answering Machines and Audiotext** ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	**Voice Originated Calls** ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	**Long Distance Calling** ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	**VCO and HCO** ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	**Alternate Call Types** ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	**Customer Database** ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLata COC ▪ IntraLata COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	**Customer Database** ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Outdial Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	**Variations** • Busy Signals • Poor Connection • No Answer • Request for Information • Speech Impaired • Pacing Voice Customer • Profanity towards CA • Request for M or F CA • CA Knows Customer • Suicide • Abuse • Illegal Calls • Sensitive Topics • Redialing • Switchboards • Young Children • Inbound ASCII • Repeating Information • Request for Relay Number • Restricted Calls • ASCII on Outbound Line • Regional 800 • Two Calling From Numbers • LEC Service Office • Double Letters • Call Waiting • Conference Calls • Three-Way Calling • Changing CAs • 800 Number Referral • Hard-of-Hearing Customer • Call Backs for TTYs • Multiple Calls
Module 4I	**Variations** • Call Modification • Holding • Alternate Language • Typing in Parenthesis • Product Information • Spanish Calls • Voice Customer Hangs Up • Variable Time Stamp • TTY Customer Hangs Up • Conversation being Recorded • Prompting Voice for "GA" • Non-Standard TTY Capability • Internet Characters • TTY does not type "GA" • Cellular Long Distance Calls • Party Line Calls

Module	Module Description
Module 5	**Emergency Call Processing** ▪ Emergency Calls ▪ Non-Emergency Calls ▪ Emergency Incident Form
Module 6A	**Performance and Procedures** ▪ Performance Measurement Plan ▪ Quality Customer Service ▪ Commitment ▪ Personal Effectiveness ▪ Assessment Survey and Replay ▪ Emergency Procedures ▪ Emergency Assistance Form ▪ Checking for Understanding
Module 6B	**Healthy Relay** ▪ Introduction ▪ Analogy ▪ Stretching Exercises ▪ CA Reinforcement ▪ Ergonomic Review ▪ Setting up Workstation ▪ GUAM - Get up and move
Module 6B	**Healthy Relay** ▪ Ergonomic Relief ▪ Slowing the Customer ▪ Overtime Relaxation
Module 7A	**Responding Positively** ▪ Stress Management ▪ Thoughts and Feelings ▪ Relaxing Emotionally ▪ Thinking Powerfully ▪ Exercise ▪ Nutrition ▪ Relaxation/Meditation ▪ Energy Resource Assessment ▪ Suggested Reading ▪ Leader's Notes
Module 7B	**Healthy Detachment** ▪ Interactive Communication ▪ TDD Communication ▪ Potential Stressors ▪ Detaching
Module 8	**Assessing Performance** ▪ Assessment Process ▪ Coaching ▪ Feedback ▪ Pass/Fail Guidelines ▪ Role Plays

Module	Module Description
Module 9	**Supervisor as Trainer and Coach** ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	**A Healthy Approach to Relay** ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	**Orientation**	What is Speech to Speech
	▪ Objectives	Differences from Relay
	▪ Welcome & Introductions	Agent Training
	▪ Description	
	▪ History	
Module 2	**Speech to Speech Customers**	Varying Speech Patterns
	▪ Objectives	Voice Synthesizers
	▪ Introduction	Types of Calls
	▪ Phone Image	Transparency &
	▪ Characteristics of Speech to Speech Customers	Confidentiality Phrases
	▪ Breaking the Stereotypes	
Module 3	**Attributes of STS CAs**	Caller Control
	▪ Objectives	Sensitivity and Understanding
	▪ Patience	
	▪ Concentration	
	▪ Listening Skills	
Module 4A	**Call Processing Procedures**	
	▪ Objectives	
	▪ Your Role as CA	
	▪ Billing	
	▪ Directory Assistance	
	▪ Changing CAs	
Module 4B	**Answering Machines and Audiotext**	
	▪ Answering Machines	
	▪ SA to SD Answering Machine	
	▪ Busy/Disconnects	
	▪ Audiotext Message	
	▪ Pagers/Beepers	
Module 4C	**Emergency Call Processing**	
	▪ Emergency Services	
	▪ EM Numbers	
	▪ Emergency Incident Form	
Module 4D	**Variations**	Using GA
	▪ Outbound to Relay	Spelling
	▪ Personal Conversations	Announcement
	▪ Operator Calls	900 Calls
	▪ Talking on Hold	Request to Hold
	▪ Keeping the Customer Informed	SD to SD through STS
	▪ Differentiating STS and Relay	Non STS Calls
	▪ Outdialing to STS	

Sprint CapTel Training Outline

1.0 Training Summary Outline

1.1 Introduction/Tour

Introductions: Lead trainer, training assistant, Call Center director, and other administrative personnel that may be involved in the first day of training. Prospective CAs are given a tour of the building and the facilities. Each individual is given a security passkey and shown how to use it. The CTI building is a secured facility and the passkey is needed to enter the parking lot after normal business hours, enter the building and gain access to the Call Center floor by stairway or elevator.

1.2 Human Resources Overview

The Human Resource coordinator meets with each group to go over required employment paperwork for the State of Wisconsin, Call Center policies, non-disclosure agreement, confidentiality requirements, expected standards that must be met to pass out of training, and current scheduling needs.

1.3 Videos

Several videos are shown to better demonstrate the job of a CA and how the technology works and how it provides improved communication for our clients. After each video, questions are answered or clarified as needed.

1.4 Mini Demonstration *CapTel* Phone

A brief explanation of the *CapTel* phone and the captioning system is given including commonly used terminology when referring to each party involved in a call. Each trainee is then able to place a short call to experience using the *CapTel* phone. This helps individuals to better understand what we are asking them to provide our clients and what the client experiences.

1.5 Introduction - Developing a Personal Voice Profile

Developing a personal voice profile is the most important step to successfully process *CapTel* calls. CAs are given specific instruction as to how to speak, how to sit, and how to utilize the computer and headset to gain optimal accuracy.

1.6 Introduction - Training Program

The *CapTel* training program allows individuals to listen to various pre-recorded scripts and "re-voice" what they hear directly into the recognition program. Individuals are coached to focus on developing the proper re-voicing technique. This simulates the conversation or voice of the hearing person and having to repeat those words to the computer accurately. Through the progression of various training scripts CAs work to improve their speed of speech while maintaining accurate pronunciation of words based on each script.

1.7 Introduction - Call Handling Tools

Macros are utilized to aid in the speed and accuracy of calls. CAs listen to pre-recorded scripts that consist mainly of macro type words and learn to utilize the macros accordingly.

1.8 Introduction - Call Handling Skills –Pacing a Conversation

CAs are introduced to further call handling skills that allow them to pace various calls in order to provide accurate captions.

1.9 Introduction - Call Handling Skills – Inserting Words

CapTel trains its CAs to insert particular words that the Voice Recognition is not able to caption successfully or in a consistent manner. These words include such things as people's names and regional cities and towns.

1.10 Introduction – How to Handle Various Recordings

CAs are introduced to various types of calls and how to handle each. The importance of verbatim transcription, confidentiality, accuracy and speed are reviewed. CAs view a demonstration by the training assistant, and then each CA is assigned scripts relating to answering machines and automated recordings.

1.11 Introduction & Demo of *CapTel* Conversation

Each trainee observes each end of the "telephone call", (CA, *CapTel* user, hearing person). Each CA assists in making "live" calls to other trainees. This encourages each CA to observe and experience what our clients experience on every call. It also allows the CA who is captioning an opportunity to practice their learned techniques on more realistic, true to life calls.

2.0 Introduction to Call Simulation

Live call simulation allows CAs to gain exposure to real incoming calls landing on the production floor, however they do not interfere with the quality of captions going to the *CapTel* user. New CAs are paired with experienced CAs on the production floor to observe and listen to live calls.

2.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive their first official timing for speed and accuracy baseline timings provide a progress report for each CA and develop a list of improvement areas. This measures the quality and accuracy of re-voicing.

2.2 Review of Baseline Timings

Training Scripts are assigned to the group. One at a time, each CA meets with the trainer to review their baseline timings. Feedback and review of standards and expectation are given.

2.3 Introduction to Correction Tool

The correction tool is introduced to provide CAs with another opportunity to provide the highest quality captions.

2.4 Review Training Elements

CAs meet as a group with the trainer to review the various elements that enable them to provide the quality of captions we expect from each CA.

3.0 Monthly Timing Policy

CTI's monthly timing policy is reviewed with all CAs. The importance of successfully passing these timings is emphasized.

3.1 Call Simulation-Timings

CAs are placed into a rotation of call simulation and receive an official timing. This second timing is a base-line timing in which re-voicing accuracy and call handling skills along with the ability to correct errors are evaluated. Each CA is unaware of when the timing will occur.

4.0 Production Floor Orientation

Current supervisors meet with the group of CAs to go over specific Call Floor procedures, expectations, break adherence, time clock, lockers, emergency plans, and point of contact individuals for questions and assistance.

CAs continue to progress onto the production floor and practice in the training room as needed. CAs are timed each day and progress is reviewed until a CA meets the expected standards or it is determined the individual is not suited for the position. Action is taken as necessary.

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Posses the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix C
TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISI-TORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

_____

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

_____

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE   DATE

_____   _____

MANAGER/SUPERVISOR SIGNATURE   DATE

CapTel CA Pledge of Confidentiality

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the *CapTel* management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any *CapTel* call.
- I will not act upon any information received while processing a *CapTel* call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at *CapTel* Inc.
- I will not share any information about *CapTel* calls with anyone except a member of the *CapTel* Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at *CapTel* Inc. after my employment ends.
- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the *CapTel* Inc. management staff.
- I will not share with anyone any technical aspect of my position at *CapTel* Inc. unless asked by a member of the *CapTel* Inc. management staff.

- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at *CapTel* Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

_____
Employee Name   Date

Appendix D
E911 Call Procedure

Sprint uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). Sprint considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a "hot key".

- The CA's terminal sends a query to the E911 database containing the caller's geographic area ANI.

- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller's ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller's ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller's ANI to the E911 center operator.

When a CapTel user dials 9-1-1, Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

If a CapTel user had only one line connected to their CapTel phone, captions will not be engaged on the call. A prompt on the phone will instruct the CapTel user how to communicate with the 9-1-1 center to request Voice-Carry-Over communications to begin. The PSAP would be engaged in typing directly to the user, and the user would be able to speak to the 911 dispatcher.

Appendix E
Sprint Carrier of Choice Letter of Invitation

Re: (Customer's name and phone number – requested LEC for
         COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint
Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in
more than thirty-two states (32), Sprint currently transports the traffic of customers who have
selected you as their Toll carrier. However, many of your customers would prefer to use
(Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls
from the regional centers or state access tandem to your network. Hence, this letter is being
written to make you aware of a potential service-impacting issue regarding TRS calls and
measures your company can take to ensure your customers' toll calls are completed through TRS.
The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established
and are monitored by the Federal Communications Commission (FCC). TRS is a service that
links telephone conversations between standard (voice) telephone users and people who are deaf,
hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The
State Public Utilities Commission manages the day-to-day operations of TRS and has contracted
with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that
all states provide TRS and that TRS users shall have equal access to their chosen interexchange
carrier and to all other operator services, to the same extent that such access is provided to voice
users. In order to provide this access to your customers, your company is encouraged to submit a
letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of
Choice program. If your company (or your facility based provider) is not currently listed, please
review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you *are a participating member* at Sprint Carrier of Choice program, please
   disregard.

2. If you *are not a participating member* at Sprint Carrier of Choice program, you need
   to establish a network presence at the regional centers or state access tandem and

accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Non-facility based provider

1. If your underlying toll carrier *is a participating member* at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.

2. If your underlying toll carrier *is not a participating member* at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.

4. You or your underlying toll carrier will need to support SS7 tandem interconnection.

5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair **_60, 66, and 67_**.

6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

> *Note: For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem. *Attachment C* is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days). **Information obtained from the carriers will be used solely for the purpose of providing equal access for** (Company Name) **LD customers and shall be held proprietary.**

Sprint welcomes your company's participation in our TRS Carrier of Choice program at **no cost** to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
     Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

Entity	**CIC Code**
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bell
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bell
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

South Carolina FCC Certification Renewal and Supporting Documents

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager
<Street1> <Street2>
<City>, <State> <Zip Code>
FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. Regional COC Tandems

You will need to provide Sprint with the following:

Toll Carrier: < insert name>

CIC Code: <insert CIC)

Underlying Toll Carrier: <insert name>
Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern Bell
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac Bell
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. **Call Type Restrictions**

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix F

Sprint Route Outage Prevention Programs

Call Before You Dig Program

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operations department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOCC in cases where a network problem may affect South Carolina operations. In cases such as these, the NOCC or RCC immediately alerts the ESOCC of the situation so that appropriate steps can be taken to minimize service impacts. The

NOCC and RCCs also serve as reference points for the ESOCC when problems are detected in the TRS center that are not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the South Carolina call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

CAPTEL OUTAGE PREVENTION

Sprint will provide FCC compliant *CapTel* service from the two *CapTel* Service Centers in Madison and Milwaukee, WI. Sprint's *CapTel* vendor *CapTel Inc.* (CTI) operates the two current *CapTel* Service Centers in the nation. These unique Centers operate with enough terminals for 200 agents each, along with support personnel, Technicians, and Supervisors.

Both *CapTel* Service Centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two *CapTel* Service Centers ensures minimum interruptions in service if something unexpectedly halts operations in one Center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

South Carolina FCC Certification Renewal and Supporting Documents

Appendix G

Sprint Disaster Recover Plan

Sprint's comprehensive Disaster Recovery Plan developed for South Carolina details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the South Carolina Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation of South Carolina is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore South Caorlina to its full operating level in the shortest possible time.

South Carolina Notification Procedure

To provide South Carolina with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for South Carolina will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the South Carolina within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to South Carolina has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the South Carolina Administrator within five business days of return to normal operation. Examples of service disruption to South Carolina include:

- ACD failure or malfunction
- Major transmission facility blockage
- Threat to South Carolina CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

Disaster Recovery Procedures

If the problem is within the relay center serving South Carolina, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOCC. If the problem occurs during non-business hours and requires on-site assistance, the ESOCC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

Time Frames for Service Restoration

Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- **Sprint Call Center Equipment -** A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- **Sprint or Telco Network Facilities -** For an outage of facilities directly serving South Carolina, incoming TRS calls will immediately be routed to one of ten other centers throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- **Due to Utilities or Disaster at the Center -** Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.
- **Due to Telco Facilities Equipment -** A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a telco central office - In Columbia, for example, only local Columbia residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

The following information is required when a South Carolina user is reporting trouble:

- Service Description ("SC")
- Caller's Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by South Carolina users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the ESOCC will handle calls from the Customer Service agents 24 hours a day, 7 days a week.

South Carolina FCC Certification Renewal and Supporting Documents

The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's 11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1   Time to Investigate + Time to Repair + Time to Notify

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2   Current MTTR Objectives

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

Escalation Procedures

If adequate results have not been achieved within two hours, a South Carolina user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3   Escalation Levels

Escalation Level	Contact	Phone
2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control networks support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network, with significant fiber miles in South Carolina, provides critical advantages over the other carriers. These advantages include:

- Quality

Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to South Carolina and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The 4 LATAs in South Carolina are served by 33 Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With 33 POPs in the state, all areas will be adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. South Carolina would primarily be served by the DMS switches in Greenville, Spartanburg, Columbia, Myrtle Beach, Charleston and other diversely located facilities serving South Carolina.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated

network management and control centers. These factors combine to assure outstanding network performance and reliability for South Carolina.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Sprint Outage Notification from *CapTel* Service Center

Performance at the *CapTel* Service Center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the *CapTel* Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the *CapTel* Service Center, OR

- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
    o An accidental switch rebooting
    o Loss of transmission facilities through the telephone network
    o Terrorist attack
    o Bomb threat or other work stoppage
    o Sudden loss of agent position capabilities.
    o Impact to minimum ASA / Speed of Answer times
    o Acts of God

Contact from the *CapTel* Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

1) What time did the outage happen in CENTRAL TIME?
2) What caused it?
3) Which customers are (or were) impacted?
4) What is (was) the solution to restore service?
5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint Procedure for Outage Notification to Contract Administrators during Business Hours

Upon receiving notification from CTI during business hours (8AM to 5PM CT), Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 468-4345 M: (925) 895-9176 E: John.E.Moore@sprint.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable CA positions or, local area network outages, the *CapTel* Center on-site technician will notify *CapTel* Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 15 minutes will be email to the state Contract Administrator.

If the problem is within the *CapTel* Center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the *CapTel* Service center to allow for the most common type of repair required without the ordering of additional equipment.

Sprint Procedure for Outage Notification to Contract Administrators outside of Business Hours

Upon receiving notification from CTI outside of business hours (5PM to 8AM CT, Monday through Friday, and all day Saturday, Sunday and holidays), John Moore (or Angie Officer) will notify Contract Administrators immediately by email of an outage if possible, but by no later than 8AM CT the next business day. Follow-ups and post-mortem will still be provided within the required guidelines.

Disaster Recovery Follow-Up

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with CapTel Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

Disaster Recovery Post-mortem documentation

72 hours (3 days) after the outage is resolved, CTI will need to provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point of contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

1) What time did the outage happen in CENTRAL TIME?

South Carolina FCC Certification Renewal and Supporting Documents

2) What caused it?
3) Which customers are or were impacted?
4) What is the solution to restore service?
5) What is the time that service will be or was restored IN CENTRAL TIME?
6) What will *CapTel,* Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

Time Frames for Service Restoration

Complete loss of service due to equipment -

- Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

- Two hours at first level
- Four hours at second level
- Eight hours at third level

These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

Partial loss of service – Due to Equipment

- Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

- Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

- Eight hours at first level

- Twenty-four hours at second level

These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

Trouble Reporting Procedures (for Individual Customers to Customer Service)

All calls concerning customer service issues should be placed by dialing the *CapTel* Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English only. A Customer Service agent will take information concerning:

- Caller's Name
- Contact Number
- Calling to / Calling from (if applicable)
- Description of the trouble

Report service affecting trouble to Customer Service during normal business hours, 8:00 AM to 5:00 PM Central Time, Monday through Friday. Normal business hours do not include Saturday, Sunday, and holidays.

Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(877) 437-4660 Pam.Frazier@captelmail.com

Table 4 – CapTel Customer Service Escalation Procedures

Hours outside the normal business day are 5:00 PM to 8:00 AM Central Time for every day of the week (Monday through Friday), and all day Saturday, Sunday, and holidays. Outside of normal business day hours, a recording will play and trouble calls can leave a message for customer service to follow up during the next business day.

South Carolina FCC Certification Renewal and Supporting Documents

The recording played to customers outside of CapTel customer service business hours:

> Thank you for calling CapTel customer service. Our hours are Monday through Friday from 8AM to 5PM central time. You may try again during business hours or leave a voice mail message by pressing 3 now.

If the "3" button is pressed, then the customer will hear the following message:

> Thank you for calling CapTel customer service. We are unable to take your call at this time. Please leave a detailed message with your name and phone number with area

> code, or email address, and a reason for your call, and one of our representatives will return your call as soon as possible.

Alternative usage for CapTel phone during outage for VCO users.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.

In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 711 (user must dial only 711 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call.

Appendix H
Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

South Carolina FCC Certification Renewal and Supporting Documents

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialed and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE]RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE]RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix I

Sprint Policy on 10- and 15-Minute Rule

Sprint understands that a change of CAs can interrupt the natural call flow. Therefore, Sprint strives to keep the same CA dedicated to each call. Sprint will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the "spirit" of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

"THIS IS CA # CONTINUING YOUR CALL."

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix J

FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Provision of Services		
δ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.	Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.
	Speech-to-speech relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).
	Interstate Spanish language relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.
Operational Standards		
δ 64.604 A.1	Communications Assistant (CA) Competency Skills	
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.
	Typing Speed - 60 WPM with technological aids	Each Sprint CA is required to take the 60 WPM typing test quarterly (four times a year).
	Oral-to-type tests	Sprint administers Oral-to-type tests.
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
		to RID Code of Ethics.
δ 64.604 A.2	Confidentiality & Conversation Context CAs are prohibited from disclosing the content of any relayed conversation regardless of content Certain exceptions are provided for Speech-to-Speech calls. CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided. Sprint CAs are prohibited from disclosing any call content. STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls. CAs relay calls verbatim and do not alter relayed conversation. During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.
δ 64.604 A.3	Types of Calls CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. TRS shall be capable of handling any type of call normally provided by common carriers.	CAs process all calls and never prohibit sequential calls or limit length of calls. Sprint TRS is capable of handling all call types normally provided by common carriers
δ 64.604 A.4	Handling of Emergency Calls Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP. A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.	Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP. CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.
δ 64.604 A.5	In-call Replacement of CAs CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10	TRS and VRS CAs stay on the call for a minimum of 10 minutes.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	minutes. STS CAs – 15 minutes.	STS CAs stay on the call for a minimum of 15 minutes.
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user. Sprint will provide the STS user information to any new provider.
	Technical Standards	
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
δ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. Abandoned calls shall be included in the speed-of-answer calculation. Speed of Answer is to be measured on a daily basis. The system shall be designed to a	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of -answer calculation. Speed of Answer is measured on a daily basis. Sprint's system is designed to the

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	P.01 standard.	P.01 standards.
δ 64.604 B.3	**Equal Access to IXCs** TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.
δ 64.604 B.4	**TRS Facilities** TRS shall operate everyday, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.	Sprint TRS is available 24 hours a day, everyday. Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use. Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.
δ 64.604 B.5	**Technology** No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities. VCO & HCO technology are required to be standard features of TRS.	Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression. Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.
δ 64.604 B.6	**Voicemail & Interactive Menus** CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal. TRS providers shall electronically capture recorded messages & retain them for the length of the call, &	CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call. Sprint does not charge for any additional calls necessary to

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.	complete call involving recorded or interactive menus.
	TRS will handle pay-per-calls.	Sprint was the first provider to process pay-per-calls (Texas, 1996).
Functional Standards		
δ 64.604 C.1	Consumer Complaint Logs

States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.

States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31. | Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.

Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.

Sprint has submitted annual summary of Consumer Complaints log report:

June 1, 2002-May 31, 2003
June 1, 2003-May 31, 2004
June 1, 2004-May 31, 2005
June 1, 2005-May 31, 2006
June 1, 2006-May 31, 2007 |
| δ 64.604 C.2 | Contact Persons

States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS. | Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements. |
| δ 64.604 C.3 | Public Access to Info

Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS. | Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that |

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
		callers are aware of all forms of TRS.
	Conduct ongoing education and outreach programs to publicize availability of 711 access.	Sprint regularly provides 711 dialing information in its education and outreach programs.
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)	(i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism. (iii) Sprint works with NECA for reimbursement of interstate minutes.
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 c.7	**Treatment of TRS Customer Info** Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.
δ 64.605	**State Certification** Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities Transmittal of Calling Party Information	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (¶16) Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (¶22) Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider.(¶25)	Sprint's SS7 platform supports Caller ID services. Sprint complies with all FCC rules pertaining Caller ID and call blocking services. Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	VCO-to-TTY VCO-to-VCO This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (¶36)	
Handling of Emergency Calls	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (¶42) This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party. Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (¶62)	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation. Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (¶68) This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided the Call Release feature since 2003. Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Three-way Calling	Three-way calling feature is generally arranged in one of two ways. (¶73) 1. The TRS consumer may request that the CA set up the call with two other parties or; 2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.

Appendix K

CapTel Mandatory Minimum Standards & Compliance Matrix

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC *CapTel* Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
δ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers. Speech-to-speech relay service shall be provided by March 1, 2001. Interstate Spanish language relay service shall be provided by March 1, 2001. In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition – i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities – we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶7)	Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first -ever in the TRS Industry. Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3. Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004. Sprint is able to process inbound 711 calls to include access to CapTel services.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Operational Standards			
δ 64.604 A.1	Communications Assistant (CA) Competency Skills	Requirement applies.	Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Use of CapTel's voice recognition software "is a permissible means …for achieving the CA's competency skills required by the TRS mandatory minimum standards" (¶39).	All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.
	CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	Waived. Interpreting typed ASL is not applicable.

Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for … enhancing transmission speed…"(¶39) | A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL |
	Typing Speed – 60 WPM with technological aids	Waived. Permits use of Oral-to-text tests instead.	CapTel's voice recognition technology transmits above 100 WPM.
	Oral-to-type tests		Oral to text tests are given to all CapTel CAs
δ 64.604 A.2	Confidentiality & Conversation Context		
	CAs are prohibited from disclosing the content of any relayed conversation regardless of content.	Requirement applies.	CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.
	CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.	Requirement applies.	CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 A.3	Types of Calls CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.	Waived for outbound calls (¶ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (¶46) Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (¶46). Requirement applies. Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 – 7/31/04). Also STS and HCO are waived (¶29).	CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls. CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call. CapTel is capable of handling all call types normally provided by common carriers.
δ 64.604 A.4	Handling of Emergency Calls Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP. A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.	Requirement applies. Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP. The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 A.5	In-call Replacement of CAs CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	Waived. (¶ 36, 47-48).	
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	Waived. (¶29)	
Technical Standards			
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	Waived. (¶53-54)	

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.2	Speed of Answer TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	Requirement applies	Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.
	Abandoned calls shall be included in the speed-of-answer calculation.	Requirement applies. Requirement applies.	Abandoned calls are included in the speed-of -answer calculation.
	Speed of Answer is to be measured on a daily basis. The system shall be designed to a P.01 standard.		Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.
δ 64.604 B.3	Equal Access to IXCs TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Requirement applies.	CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.4	TRS Facilities TRS shall operate everyday, 24 hours a day. TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.	FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (¶ 22, 24) State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (¶ 22).	Sprint CapTel is available 24 hours a day, everyday. Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use. Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.
δ 64.604 B.5	Technology No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities. VCO & HCO technology are required to be standard features of TRS.	FCC acknowledged that CapTel is an enhanced VCO service of TRS (¶ 44). Waived for HCO. (¶ 29)	Sprint is the nation's leader in the development and offering of technological features for TRS.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 B.6	**Voicemail & Interactive Menus** CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal. TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages. TRS will handle pay-per-calls.	Requirement applies. Requirement applies.	CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played. CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call. Sprint CapTel supports pay-per-call call types.
	Functional Standards		

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.1	Consumer Complaint Logs States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution. States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	Requirement applies.	Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution. Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.
δ 64.604 C.2	Contact Persons States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Requirement applies.	Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
δ 64.604 C.3	Public Access to Info Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS. Conduct ongoing education and outreach programs to publicize availability of 711 access.	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Requirement applies.	CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)	Requirement applies.	(i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate CapTel is recovered from all subscribers of interstate services (iii) Sprint works with NECA for reimbursement of interstate minutes.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC *CapTel* Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
δ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Requirement applies.	Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities	Concluded that if a TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID service.	Requirement applies.	Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators. Sprint CapTel will deliver the SS7 technology on February 1, 2004.
Types of Calls	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to HCO are waived. VCO requirements still apply.	Sprint CapTel supports the VCO calling combinations.
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1-1. Sprint will route the call directly to the most appropriate PSAP.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Answering Machine Retrieval	Concluded that the answering machine and voice mail retrieval are TRS features that must be provided to TRS users. Answering machine retrieval through TRS is accomplished when the recipient of the message, the TRS user, calls the TRS facility and has the CA listen to the voice messages.	The requirement was not addressed in the Declaratory Ruling.	Answering machine and voicemail retrieval is provided by CapTel. Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.
Call Release	Concluded that call release is required under FCC's functional equivalency mandate. Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows CA to sign-off or be "released" from the telephone line without, triggering a disconnection between two TTY users, after the CA connects the originating TTY caller to the called party's TTY through e.g. a business switchboard.	Waived. (¶ 52)	
Speed Dialing	Concluded that speed dialing feature is required under FCC's equivalency mandate. Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.	The requirement was not addressed in the Declaratory ruling.	CapTel telephones have the Speed Dial feature.

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way Calling	Concluded that three-way calling is required under FCC's functional equivalency mandate but did not specifically mandate the way such functionality had to provide.

The FCC's Order imposing such requirement stated that "generally" three-way calling can be provided "in one of two ways." One way is for the TRS consumer to request that the CA set up the call with two other parties.

The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. | The requirement was not addressed in the Declaratory Ruling. | Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling. (For One-Line CapTel.) For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option.

Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals. |

Appendix L

Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report
April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP(VoIP) requires Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in	We are currently providing two-line VCO and HCO controlled at the agent position using IP or ISDN inbound from

South Carolina FCC Certification Renewal and Supporting Documents

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies. Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.	Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated Number Identification information for Internet or Video	Sprint implemented a "manual" (directory assistance lookup) process for 911 calls through	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated Number Identification information for Internet or Video	No additional information to submit beyond our recent submission to the FCC. Current options may

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to interexchange carrier features for Video Relay Service.	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO – t o- TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communicatio n between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communicatio n between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter agent from the	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call between two

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix M
Sprint Relay Fact Sheet

<u>Sprint Relay</u>
www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

<u>Sprint Relay Services</u>

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:
Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-

speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experience Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.

2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

*CapTel*SM (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, *CapTel*-equipped phone is required in order to place a call through the *CapTel* relay service. The *CapTel* phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the *CapTel* phone's built-in screen so the user can read the words while listening to the voice of the other party. For more information on CapTel, visit www.captionedtelephone.com.

Relay Conference CaptioningSM , developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

South Carolina FCC Certification Renewal and Supporting Documents

Appendix N

Sprint TSP Press Release

Media Contact:
Stephanie Taliaferro, 913-794-3658
stephanie.c.taliaferro@sprint.com   General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services
Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

South Carolina FCC Certification Renewal and Supporting Documents

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.

Appendix O
Copy of Annual Report

Relay

7 1 1

Relay South Carolina
Annual Report 2006

Table of Contents

Sprint
Together with NEXTEL

Sprint Nextel
905 State Street
Cayce, S.C. 29033
Office TTY: (803) 936-6325
Fax: (803) 936-6326

Missy Whatmough McManus
Account Manager

Dear Office of Regulatory Staff:

The recent fiscal year, July 2005 to June 2006, has demonstrated once again that Sprint Relay South Carolina continues to deliver the highest quality and functionally equivalent services to meet our customers' communication needs. Sprint Relay South Carolina has provided outstanding Telecommunications Relay Services, some of which include: TTY to Voice, Voice to TTY, Speech to Speech, and Voice Carry Over. Sprint has been proud of our ability to meet and exceed the requirements put forth by the State.

Relay South Carolina continues to experience a decrease in Telecommunications Relay Service (TRS) call volume, due to the rise in Internet-supported relay calls, Video Relay Services, and Wireless Communication. There also has been a steady increase in the number of Captioned Telephone (CapTel) calls, which has contributed to the decrease in traditional Voice Carry Over calls.

South Carolina has completed its first year of CapTel services via the pilot project. The demand for CapTel has gone above our expectations. Comments from CapTel users indicate that this new technology has had a tremendous positive influence in their overall quality of life. For some, the CapTel phone has even allowed users to keep jobs requiring telephone access, as a condition of employment.

Major TRS accomplishments from July 2005 to June 2006 include:
- Revamping the Relay South Carolina Web site,
- Redesigning the Relay South Carolina brochure into a full-service booklet,
- Creating and developing a "Do Not Hang Up" public service announcement that was aired over four months for a total of 1,781 times at various television stations throughout South Carolina, and
- Being interviewed for *Focus on the Palmetto State* on WBSC-TV 40/WLOS.

In the Sprint field, we launched a brand-new identity, with a new logo and colors, after merging with NEXTEL to allow increased wireless capabilities.

Sprint is grateful to be given the opportunity to provide South Carolina with superior telecommunication relay services. We would like to thank the Office of Regulatory Staff for their support during their challenges with several changes in personnel.

Can you continue to expect a future full of possibilities? Sprint and NEXTEL has come together to offer more choices and flexibility. We are the new Sprint, and YES YOU CAN!

Sincerely,

Missy McManus

Missy McManus
Relay South Carolina

Relay South Carolina Enhancements

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Our participation in the TSP Program stregnthens our already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:
- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and *Cayce, SC*)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- Miami Switch (Miami, FL)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay South Carolina users. Sprint is proud to voluntarily comply with the FCC's TSP program.

Customer Contacts Online Database

To further support the existing Sprint Relay complaint resolution process, we have developed a Customer Contacts Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts. The CCOD tracks customer contact information as required by the FCC, which will assist the Sprint Relay contracted states to obtain recertification from the FCC. The CCOD will automatically notify the account managers via e-mail of any complaint or commendation entry, ensuring that they receive timely notification of these responses. Sprint resolves all customer contacts and concerns within 10 days, and report them to the ORS via monthly traffic reports. The account managers then ensure that community feedback is addressed expeditiously and are available to respond to all consumer concerns. Sprint exceeds the FCC guidelines regarding customer contacts.

CapTel with True Caller ID

As of August 29, 2005, True Caller ID is available to all CapTel customers of Sprint. CapTel customers do not need to make any changes to their equipment; users who subscribe to Caller ID through their local telephone company can now view the name and number of the person calling on their Caller ID box.

2-Line CapTel

If a CapTel user prefers to receive a CapTel call from the caller directly instead of the captioning service, the solution is called 2-line CapTel. A CapTel phone is equipped for two-line capabilities, which allows a CapTel user to receive captions on every call, at any time in the call. With 2-Line CapTel enabled, a CapTel user can:
- Receive captions on all incoming calls (the caller dials you directly, instead of placing the call through the captioning service).
- Turn captions on at any point during a conversation.

- Give your callers one telephone number (there is no separate captioning service number for callers to remember).
- Get full captioning for every type of call, including emergency calls and calls through relay.
- Share a call without interrupting captions (others can also pick up an extension line).

*Note: Using CapTel in 2-line mode is optional, and requires a second analog telephone line.*

Improving the Customer Experience

Sprint has begun a new and ambitious project called "Improving the Customer Experience, Voice and Signs of the Customer" (ICE). ICE is an ongoing and continuous project to improve the customer experience when using relay. This project began by holding focus groups and one-on-one interviews with TRS users. Sprint hosted focus groups during 2005 in Rochester, NY, Denver, CO, Austin, TX, and Washington, DC. The focus groups have been a wonderful experience and Sprint is truly hearing the voice of the relay user. We will continue to host these meetings through 2006.

Based on feedback and input received through the ICE program from both customers and internal staff, we are preparing to implement the first set of improvements to Sprint Relay that began August 22, 2006. A few of these changes are internal, affecting the training and operations of Communication Assistants (CA) and some are external, improving the experience of the relay user.

What is CapTel?
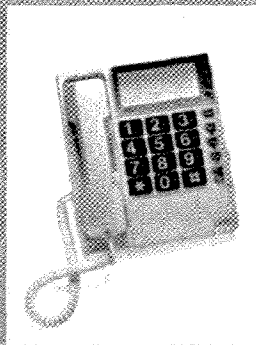
CapTel is an assistive technology aimed at easing communications for the more than 24 million Americans who are hard of hearing, have experienced hearing loss later in life or are deaf individuals with good vocalization skills.

CapTel with True Caller ID is available through Sprint in 25 states, including South Carolina. Active and retired hard of hearing federal government employees (civilian, military and federally recognized U.S. tribal members) also can take advantage of CapTel services through Federal Relay.

CapTel is a leading-edge technology developed by Ultratec, Inc. of Madison, WI, that requires a special CapTel-equipped phone in order to place a call through the CapTel Relay Service. The CapTel phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference: live captions are provided for every call.

The captions are displayed on the CapTel phone's built-in screen so the user can read the words while listening to the voice of the other party. This allows conversations to flow more naturally, allowing for normal interruptions and expressed emotions. CapTel services are available 24 hours a day, 7 days a week, 365 days a year.

For more information, visit www.sprintrelay.com.

Sprint Relay Product Enhancements (available in South Carolina)

Sprint Video Relay Service

Videophone with a television set

Sprint Video Relay Service (VRS), as of November 1, 2005, is available any time, 24 hours a day, 7 days a week, 365 days a year. Sprint VRS enables users who use sign language to communicate using videoconferencing technology, with an interpreter via the Internet. The interpreter relays the signed conversation over a standard phone in real time to the hearing caller. By using sign language over the full-motion video, the sign language user can communicate in their natural language and convey facial expression and cues to ensure nothing gets lost in the translation. The sign language user needs a videophone with a television or a Web cam with a computer.

Additionally, the Sprint VRS Web site was updated with a crisp and clean look, along with the new Sprint logo and colors. The South Carolina VRS Web site also has been updated with a similar look.

SC VRS Website

Sprint VRS Web site

Sprint Video Relay Service: Features

Sprint VRS provides additional features that enhance the service and make the experience convenient, beneficial and enriching for our users.

Announcements: Get the latest Sprint press releases, announcements and more.

Sprint VRS Mail: Receive VRS Mail when you are unavailable to receive a call from a hearing caller. When you receive a VRS mail, play the video on your computer to view the recorded message in sign language.

Manage Your Account: Your Sprint VRS profile allows you the flexibility of creating your own user settings to expedite your VRS calling needs.

New Member: Sign up to customize your profile with your VRS preferences and to receive Sprint VRS mail.
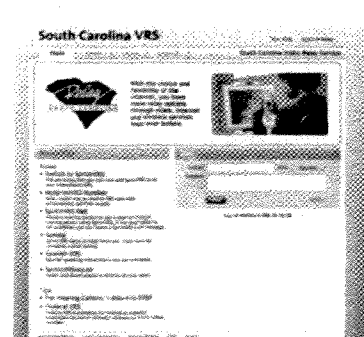
Current Member: Your user profile provides the video interpreter with preferences that state whether you are a Voice Carry Over user or Spanish user, if you have VRS mail, answering machine greetings, pager notification settings, and privacy settings.

**Phonebook**: Save your frequently dialed numbers to access your VRS calls quickly and easily.

Wallet Cards: Print, cut out and share your VRS number to friends, family and businesses so they can call you via VRS.

Customer Service Support: Sprint VRS offers several choices to meet your customer service needs, such as: live chat on video, e-mail, TTY, voice or fax.

Additional information online includes operating hours, types of calls, call procedures, and frequently asked questions as well as technical requirements, troubleshooting tips and instructions.
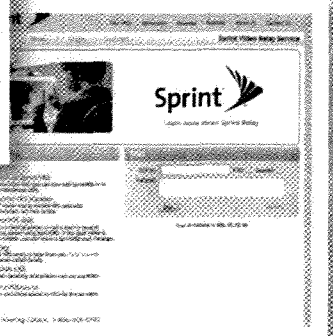
For more information on Sprint VRS, visit www.sprintvrs.com or www.rscvrs.com.

Sprint Video Relay Service: VCO & Spanish

On November 1, 2005, Sprint launched two new VRS enhancements to support sign language users: Sprint VRS Voice Carry Over (VCO) and Spanish VRS. VRS hours were extended to 24 hours a day, seven days a week, 365 days a year.

VRS VCO

Sprint VRS VCO allows a deaf or hard of hearing user who prefers to voice for himself or herself to speak directly to the other party as a video interpreter signs what the hearing person is saying. Based on the VCO user's communication preferences, the video interpreter will use American Sign Language, English-based sign language, or English-based sign language (close-up) option for those who benefit from speech reading.

To access VRS VCO:
Videophone users: Add SprintVRSVCO.tv to the videophone address book and click on it to dial.
Web cam users: Type SprintVRS.com in the browser and click on VCO.

Spanish VRS

Through Spanish VRS, video interpreters will translate American Sign Language to spoken Spanish and vice versa. Spanish VRS operating hours are 7:00 a.m. to 8:00 p.m., Eastern Standard Time, on Monday through Friday.

To access Spanish VRS:
Videophone users: Add Spanish.sprintvrs.tv to the videophone address book and click on it to dial.
**Web cam users**: Type SprintVRS.com in the browser and click on Spanish.

Sprint Internet Protocol Relay

Sprint launched a major enhancement to its Internet relay service on November 22, 2005, providing a more user-friendly layout, a shorter Web site address and faster user connectivity.

SprintIP Relay is a free service that allows people who are deaf or hard of hearing to enjoy the ease of communicating with hearing individuals from any computer without having to use traditional TTY equipment. The new flash-

enabled Web site offers convenient new features for customers as they use SprintIP Relay, such as:

Sprint IP Relay Web site

- Clean and crisp new look.
- One-time set up for user preferences, such as font sizes and colors.
- Resizable windows to better manage multiple views on the computer screen.
- Simplified printing function.
- Available on several browsers, such as Internet Explorer, Netscape, Safari and Firefox.
- Compatible with various operating systems, including Apple/Macintosh.
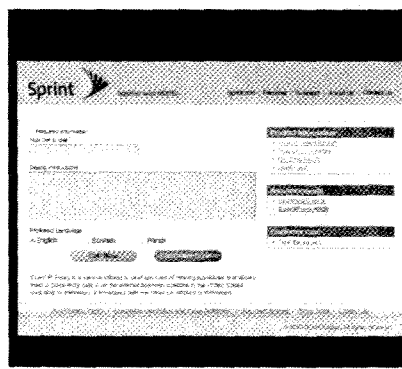
SprintIP on AIM

Sprint IP Relay offers an access method for AIM˚ (AOL Instant Messanger) users on a PC, Macintosh and wireless devices.
- SprintIP is the screen name to connect with Sprint IP Relay.
- Add SprintIP to the AIM˚ Buddy ListTM feature to place a relay call using a Sprint Operator. For Spanish relay service, type "Espanol" to connect with a Spanish speaking relay operator.
- 'GA' is not required when using AIM˚. Users will not see 'GA' coming from the operator.

SprintIP Wireless via Blackberry Pagers

The free Sprint IP Wireless download application allows Blackberry users to access Sprint IP Wireless Relay and connect with a relay operator. The relay operator will connect to a standard telephone voice user and relay the conversation between the two callers.

The Sprint IP Wireless application may be downloaded to BlackBerry devices (including 7250, 7290, 7520, 8700, and 7105) with an operating system of version 3.7 or higher, supported by Sprint and other wireless networks.

Relay South Carolina Outeach & Marketing

Relay South Carolina Web Site

Relay South Carolina Web Site

After several months of planning, developing, creating, and working with a deaf-owned media company, the completely overhauled Relay South Carolina Web site was unveiled in November 2005. The Relay South Carolina Web site contains various relay product and service information.

Links include:
- Home
- Contact
- About Relay (including a link to the Office of Regulatory Staff Web site and to the South Carolina TEDP Web site, etc.)
- Relay Calls (including TTY, VCO, STS, and others)
- Caller's Corner (including Customer Database Profile, FAQs, etc.)
- News/Events (including Product/Service Announcement, Organizations/Agencies, etc.)

The Web site not only provides information on Relay South Carolina products and services, but also includes demonstrations on how people can download applications for services, an explanation about the South Carolina Telecommunication Equipment Distribution Program (TEDP) and a link to download an application for specific types of equipment, the ability to set up an online appointment with the account manager, and more.

Relay South Carolina Web Site Statistics

At the beginning of every month, the account manager receives a statistics report on the Relay South Carolina Web site. From November 2005 until June 2006, there were a total of 77,852 hits, representing the total number of requests made to the server during the given time period; the daily average of hits each month ranged from 330 to 490.

Month/Year	Hits
November 2005	10,202
December 2005	8,876
January 2006	10,248
February 2006	13,737
March 2006	8,492
April 2006	7,837
May 2006	8,306
June 2006	10,154
July 2006	11,499
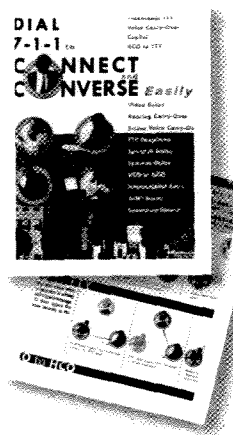
Brochure

To promote Relay South Carolina services, individual flyers were created to describe each service (TTY, VCO, STS, etc.) for the past eight years. This year, we decided that all relay services and products would be explained in an all-in-one brochure since many customers benefit from more than one Relay service. After months of wordcrafting, design creation, and other essentials, a beautiful brochure was the end product.

At right are some pages from the revised Relay South Carolina brochure, which were printed and released in December 2005. Large-type and Braille copies are also available; Relay South Carolina is proud to be one of the few states to provide these print methods.

Public Service Announcement

In January, Relay South Carolina launched a public service announcement (PSA) campaign that continued for four months and aired 1,781 times. This announcement was the result of creating a TRS script, practicing lines, going to the studio for filming, editing the film, adding open captions and the Relay South Carolina Web site address, contacting television stations throughout the state of South Carolina, and securing airtime—all which took a few months of preparation (*See the appendix for the PSA Air Time Schedule*).

The PSA helped generate awareness of Relay South Carolina services. It also had an additional benefit: promoting awareness of persons who are deaf, hard of hearing, deafblind, and/or have a speech difficulty.

A public service announcement for Relay South Carolina

One example of the success of the PSA project was the increase of calls to the relay call center. Prior to the PSA screening, there were 272,327 intrastate calls and 319 intralata calls (within the state of South Carolina) between October and December 2005. Following the PSA airing, the number of in-state calls increased, with 462 calls in January 2006, 409 in February, and 349 in March. This illustrates the PSA's enormous success.

Promotion of the PSA resulted in a prime sponsorship for the opening ceremonies of the Winter Olympics in Charleston on NBC. The PSA also generated opportunities for Relay South Carolina to be interviewed regarding TRS services on an upstate television program, *Focus on the Palmetto State*.

Relay South Carolina Outeach & Marketing (continued)

Outreach Efforts

Relay South Carolina, in collaboration with outreach vendors, promoted relay service awareness by providing demonstrations, presentations and materials to various groups (see box on next page) between July 2005 and June 2006. Products included TRS, video relay, Internet relay and wireless relay.

Relay Events and Presentations

The account manager supported the Sprint Relay exhibition booth at the DeafNation Expo in Greensboro, NC, on April 1, 2006. This event brought in 2,600 individuals from North Carolina, South Carolina, Virginia, Tennessee, and Georgia. Sprint Relay and Relay South Carolina were given opportunities to share our services to all of the people that came.

Relay South Carolina Customers at DeafNation Expo in Greensboro, NC on April 1, 2006

The account manager also co-led the Sprint Relay exhibition booth at the DeafNation Expo in Atlanta, GA, on May 13, 2006. This event brought in 3,700 individuals from Georgia, South Carolina, Alabama, Mississippi, and Tennessee. Sprint Relay and Relay South Carolina were given opportunities to share our services to all of the people that came.

Public Education and Promotions

Sprint/Relay South Carolina materials and giveaways were distributed at various events, depending upon requests. Some materials were distributed in person, and others were distributed through various non-profit agencies and organizations as well as via mail.

Relay Materials and Promotions

- Sprint Relay DVDs and videotapes
- Speech-to-Speech videotapes
- Relay South Carolina brochures outlining each relay service and product.
- Relay Rabbit coloring books for children
- Relay South Carolina pens
- Relay South Carolina neon-colored pencils
- Relay Instruction Wallet Cards
- 800 toll-free numbers magnets
- 800 toll-free numbers stickers
- *Relay Today* newsletters
- Relay South Carolina plastic bags
- Sprint plastic bags
- Video Relay Service flyers and posters
- Sprint IP flyers and postcards
- Enhanced Turbo Code Dial flyers
- Logitech 4000 Web cameras
- D-Link DVC-1000 videophones
- Relay South Carolina LED-lighted bouncy balls

In addition to the television public service announcement and interview mentioned earlier in this report, Relay South Carolina also placed advertisements and articles in regional newsletters within the state and sponsored organizations and/or events in exchange for an opportunity to exhibit, present or advertise Relay South Carolina or Sprint Relay services.
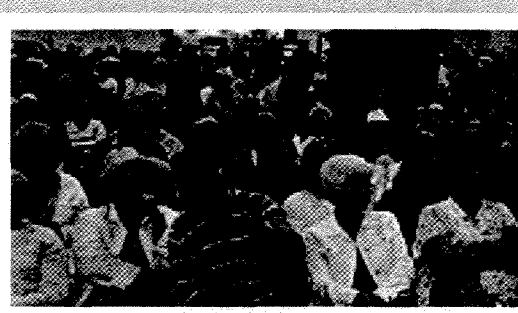
Awards and Recognition

Relay South Carolina was humbled and honored to be awarded with the Community Service Award by the South Carolina Association of the Deaf (SCAD) at the SCAD's biannual conference in July 2005. The inscription on the award reads:

> *"To a group, an organization, an agency or an individual for exemplary community services in South Carolina. These may be in various forms such as: providing publicity of deafness through media, making deaf awareness possible, or giving some kind of services to the deaf community."*

In 2006, the Sprint Account Manager for Relay South Carolina:

- Set up and coordinated CapTel training to TEDP staff (Anne Bader and Mark Cash) and Dr. Barry Morris. NC CapTel AM provided this training.
- Sponsored, exhibited, and participated at the SCAD conference in Charleston, with 103 people in attendance.
- Exhibited at the Georgia Association of the Deaf conference in Macon on July 14-15.
- Presented for three hours with a CSD colleague in Columbia, with 115 in attendance.
- Worked with a Girl Scout for 15 hours on relay products to help her earn the Bronze Award. Co-presented with her;15 people attended.

Audience Members at DeafNation Expo in Atlanta, GA on May 13, 2006.

- Sponsored and presented on relay and TEDP services at a South Carolina Black Deaf Advocates meeting in Columbia; 20 attended.
- Exhibited at the South Carolina School for the Deaf and Blind homecoming; about 550 attended.
- Visited the new Conway ROC center and met with the director.
- Sponsored South Carolina Deaf Golfers Association and distributed Relay South Carolina materials.
- Attended VRS Consumer Association meeting in Spartanburg.
- Exhibited and presented at the National Association of the Deaf Region III meeting in Orlando; 50 people attended.
- Asked the NC CapTel account manager and her subcontractor to take my place at the Pee Dee Senior Life Expo in Florence while I was out of state.
- Six deaf students from Crayton Middle School visited the relay center. Demonstrated and explained various relay services.
- Worked as back-up Account Manager for five other states during the winter holidays.
- Presented to four different classes of 25 students each (100 students total) at Nursery Road Elementary school in Irmo.
- Sponsored South Carolina School for the Deaf and Blind during its Deaf Teen America pageant held in Spartanburg. Served as one of the five judges as well.
- Explained Relay services to 122 deaf senior citizens in Myrtle Beach.
- Supported the DeafNation Expos in Orlando, FL (3,600 attendees); Greensboro, NC (2,600 attendees); St. Louis, MO (2,700 attendees); and co-led in Atlanta, GA (3,700 attendees).
- Closed and completed customer comments for the FCC filing.
- Met with several customers and/or officers of various organizations to give a tour of the call center, to explain relay features, to demonstrate relay products, to plan future workshops, and more.

Relay South Carolina Call Center

Sprint subcontracted with Communication Service for the Deaf (CSD) to provide TRS services to connect calls through various groups and means such as TTY, Speech-to-Speech, Voice Carry Over, Hearing Carry-Over, Deafblind Pacing, ASCII, International, Directory Assistance, TTY Public Payphones, Spanish, and Voice calls.

CSD Call Center Report: July 2005-June 2006

The CSD Call Center is very proud to have provided relay services to South Carolinians for over three years, operating from our facility in Cayce.

CSD Relay Center Staff

CSD Relay Center Staff

CSD maintained a staff of 10, including a senior center manager/human resources manager, a trainer, five supervisors, a workforce analyst, an administrative assistant/staff interpreter, and a receptionist. The staff supports every facet of the Center's 18-hour day, 7 days a week, and most importantly, the 150+ Communication Assistants (CAs) who relay the calls for our customers.

The call center has 61 workstations, which is the maximum number of Communication Assistants online to relay calls at any one time. The center provides services to the deaf and hard of hearing community within the state of South Carolina and is also staffed to handle overflow traffic from other states on an as-needed basis. This quality measure ensures that FCC and state guidelines and contractual obligations are met in the event of any type of disaster.

Call Center Floor

During the last quarter of the fiscal year, Sprint Relay implemented a new Customer Service Initiative (CSI). This was an exciting process change that was the result of feedback received from our both consumers and relay agents. CSI has impacted the way we greet and close consumers' calls, and has improved consumers' experience when we out-dial and reach a recording. We believe this initiative will differentiate us from other relay providers and will enhance the consumers' overall relay experience and satisfaction with Relay South Carolina.

Community Service

CSD believes strongly in community involvement. Some of the ways CSD gave back to the community included:

- CSD employees participated in two successful blood drives for the American Red Cross in October 2005 and April 2006.
- CSD employees donated $4,320 in cash for the American Red Cross for Katrina Disaster relief victims in September 2005.
- CSD employees donated over 1,400 food items for the Harvest Hope Food Bank in November 2005.
- The CSD call center adopted a family for the Christmas holiday through the Palmetto Project's Families Helping Families program. Our family of five included deaf parents and three children, one of whom was disabled. Employees ensured a happy holiday for the family by providing new clothes, books, toys, bicycles and food and retail gift certificates.

The employees of CSD are proud of the work they do here at the relay center and feel a true sense of satisfaction in providing relay service for the deaf and hard of hearing community.

Relay South Carolina TRS Statistics

The charts on the next several pages indicate the trends of our annual call volume. The numbers reflect the availability and usage of the technology that is provided by Relay South Carolina and Sprint. As indicated in the account manager's letter, conversation minutes continue to show a drop in calls over the past years. This is the result of consumers utilizing alternative modes of communication such as email, VRS, wireless pagers, Internet services, and faxes.

Total Call Volume

The following charts indicate the trends of our annual call volume. The numbers reflect the traditional relay services (e.g: TTY, Voice, TTY and Voice Spanish, VCO, TeleBraille, STS, and a few others) that are currently provided by Relay South Carolina. The conversation minutes continue to show a drop in calls over the past five years.

Total Relayed Calls (in minutes)	
2003	1,776,499
2004	1,734,239
2005	1,483,888
Jan.–June 2006	682,817

CapTel

In August, Sprint Relay was thrilled to help establish the CapTel phone and service for South Carolina consumers, thanks in a large part to the Office of Regulatory Staff. A press release (shown in box) was distributed, and response was overwhelmingly positive.

CapTel Statistics

Starting August 1, 2005, per the CapTel contract, five CapTel phones were distributed each month until June 2006. In that time period, a total of 36 CapTel phones have been distributed by the South Carolina Telecommunication Equipment Distribution Program (TEDP). From July until December 2005, there were a total of 10,187 CapTel conversation minutes. During January–June 2006, this number doubled to a total of 26,030 CapTel conversation minutes, a remarkable achievement. (*See appendix for Captel Traffic Report*).

Sprint Launches CapTel™ for Hard of Hearing Community in South Carolina

Aug. 1, 2005 – Sprint (NYSE: FON) now is offering CapTelSM Relay Service (captioned telephone) in South Carolina. CapTel is an assistive technology aimed at easing communications for the more than 24 million Americans who are hard of hearing, have experienced hearing loss later in life or are deaf individuals with good vocalization skills.

"Those who have used CapTel phones sum up the experience in one word – freedom," said Dr. J. Barry Morris, Research Administrator at the Office of Regulatory Staff in South Carolina. "The calls are more like an ordinary conversation compared to other relay calls, and we're excited to bring this service to our citizens."

CapTel is available through Sprint in 22 other states, including Alabama, Arkansas, California, Colorado, Connecticut, Florida, Hawaii, Illinois, Indiana, Minnesota, Mississippi, Missouri, Montana, Nevada, New Mexico, North Carolina, Ohio, Oregon, Texas, Utah, Vermont and Virginia. Hard of hearing active and retired federal government employees (civilian, military and federally recognized U.S. Tribal members) also can take advantage of CapTel services through Federal Relay.

For more information on CapTel services provided by Sprint, please visit www.sprintrelay.com or refer to Ultratec's Web site at www.captionedtelephone.com. The South Carolina Telecommunications Equipment Distribution Program (SC TEDP) provides telecommunications equipment at no cost to South Carolina residents with qualifying hearing, speech, blind/low vision with hearing loss or dual sensory disabilities. The SC TEDP can be reached at 1-877-225-8337 or (803) 896-8337.

Relay South Carolina TRS Statistics (continued)

Call Origination

The chart indicates that most of the Relay South Carolina calls are being originated by TurboCode TTY users. This follows a similar pattern in other states.

July-December 2005		January-June 2006	
TTY	16.69%	TTY	16.27%
TurboCode	50.80%	TurboCode	50.90%
ASCII	.02%	ASCII	.02%
Voice	21.66%	Voice	21.07%
VCO	10.83%	VCO	11.71%
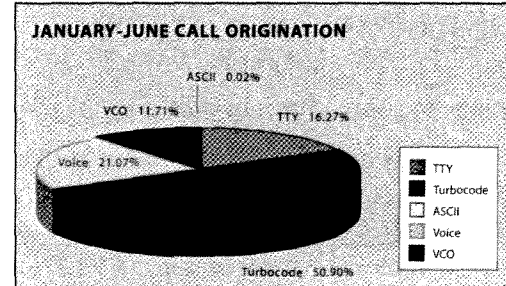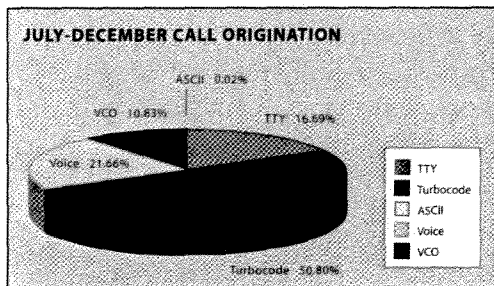
Speed of Answer

The charts below illustrate that Sprint has exceeded the speed of answer requirement throughout the year. "Speed of answer" identifies the number of seconds required to answer a call. The daily requirement is 85% of all calls being answered within 10 seconds. The Average Speed of Answer (ASA) for July–December 2005 was 2.38 seconds and the Service Level (SVL) was that 92.5% of calls were answered within 10 seconds. The ASA for January 2006 – June 2006 was 2.4 seconds and the SVL was that 91.8% of calls were answered within 10 seconds.

Speed of Answer					
July 2005	Aug. 2005	Sept. 2005	Oct. 2005	Nov. 2005	Dec. 2005
95.0%	92.0%	92.0%	90.0%	92.0%	94.0%
1.8	2.6	2.5	2.9	2.4	2.1
Jan. 2006	Feb. 2006	March 2006	April 2006	May 2006	June 2006
93.0%	92.0%	91.0%	91.0%	91.0%	93.0%
2.3	2.4	2.5	2.4	2.6	2.1

SPEED OF ANSWER - SVL Monthly Averages

SPEED OF ANSWER - ASA Monthly Averages
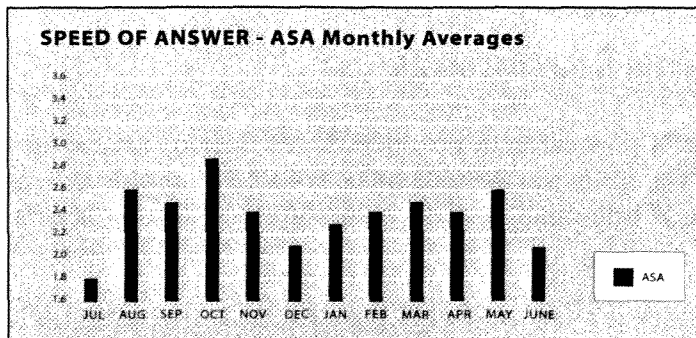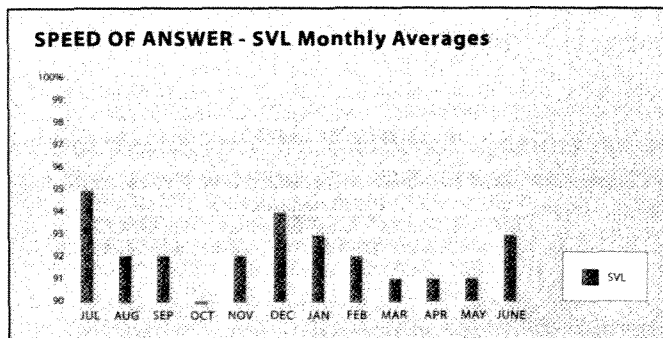
Customer Service Contact Data

Sprint Customer Service is responsible for handling customer requests such as:
- Registering Customer Database profiles
- Responding to reports of technical issues
- Sending relay information materials
- Receiving customer suggestions, comments and complaints

Each request from a relay user is given full attention and every effort is made to satisfy the customer. The following chart illustrates the number and call types that were received from customer requests including commendations, complaints and information requests. The most common types of complaints were that the Communication Assistant (CA) did not follow customer instructions, technical problems, or the CA did not relay the calls properly. The most frequent commendations Relay South Carolina users made about the relay was the CA did a great job relaying the call. Follow-up calls to the complainants often reveal the user's misunderstanding of the process involved during the call. This information is shared with the FCC on a yearly basis.

Call Types Received						
	July 2005	**Aug. 2005**	**Sept. 2005**	**Oct. 2005**	**Nov. 2005**	**Dec. 2005**
Commendations	5	9	5	3	5	4
Complaints	4	6	0	6	4	2
Inquiries	339	425	299	379	367	378
	Jan. 2006	**Feb. 2006**	**March 2006**	**April 2006**	**May 2006**	**June 2006**
Commendations	1	3	4	1	5	4
Complaints	3	2	2	1	0	3
Inquiries	388	331	323	361	373	332

The appendix includes the full Relay South Carolina Traffic Report.

Sprint Industry Report

Sprint Relay Accounts

Sprint currently provides relay services to 31 states, the federal government, Puerto Rico and New Zealand. In 2005, Sprint was awarded two new state TRS contracts, to provide relay services for Delaware and New Jersey. The map below indicates which states are served by Sprint Relay.
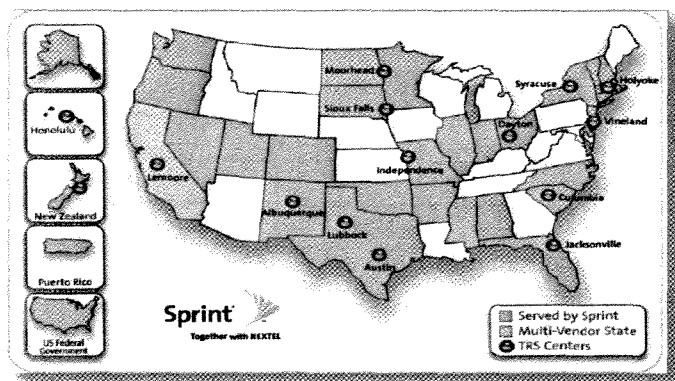
Product Enhancements in 2005

Sprint implemented several key enhancements to the Telecommunications Services Priority Program, Caller ID Network, Customer Contact Online Database, Video Relay Service, Internet Relay and Relay Conference Captioning. The Sprint Relay outreach teams have gone above and beyond to increase awareness of these exciting new products across the country by offering extensive hands-on product training and demonstrations at trade shows, state events, and non-profit organizations, as well as with business associates and individuals. Our team strongly believes in keeping relay users informed of all new technologies.

Sprint Relay Product Enhancements (not available in South Carolina)

Relay Conference Captioning

Sprint and Caption Colorado jointly developed Relay Conference Captioning (RCC), which combines real-time captioning with relay conference services to enable deaf and hard-of-hearing individuals to fully participate in conference calls. RCC is currently provided in Arkansas, North Carolina, and through the Federal Relay Service.

RCC uses the same high-quality stenocaptioners that provide closed-captioning for live news, sports and weather on television. Real-time text is streamed to an internet-connected computer anywhere in the world, and does not require a high-speed internet connection; dial-up (56k) will work. RCC has user-friendly features, including:

- Language preferences (English or Spanish)
- Background color options
- Text color/size options
- Text transcript of teleconference conversation
- Online customer support
- New features under development.

Supporting Team Members

Sprint Government Systems Division

Tony D'Agata
Vice-President & General Manager
Sprint GSD

Mike Ligas
Assistant Vice President
Sprint TRS

Business Service Operations | Sprint Business Solutions

Operations
Lori Lockhart
Director

Ron Peay
Vendor/Subcontractor Operations

Mary Cole
Curriculum and Training

Billing
Lisa Hernandez
Engineering

Roy Monica
Design & Development

Michael Haines
Engineering & Implementation

Delwin Coleman
System Maintenance

Sales
Ken Goulston
Account Executive

Andrew Brenneman
Senior Account Executive

Mike Ellis
Senior Manager

Customer Service
Brian Adamson
Marketing

Missy McManus
Account Manager

Paul Rutowski
Customer Relations Manager
Eastern Division

John Hogue
Program Manager

Business Development
Paul Ludwick
Manager of Business Development

Contracts
Don Rawlings
Contracting Officer

Appendix P
Copy of Relay Brochure

DIAL 7-1-1 to CONNECT and CONVERSE Easily

Traditional TTY
Voice Carry-Over
CapTel™
HCO to TTY

Video Relay

Hearing Carry-Over

2-Line Voice Carry-Over

TTY Payphone

Sprint IP Relay

Spanish Relay

VCO to VCO

International Calls

AIM® Relay

Speech-to-Speech
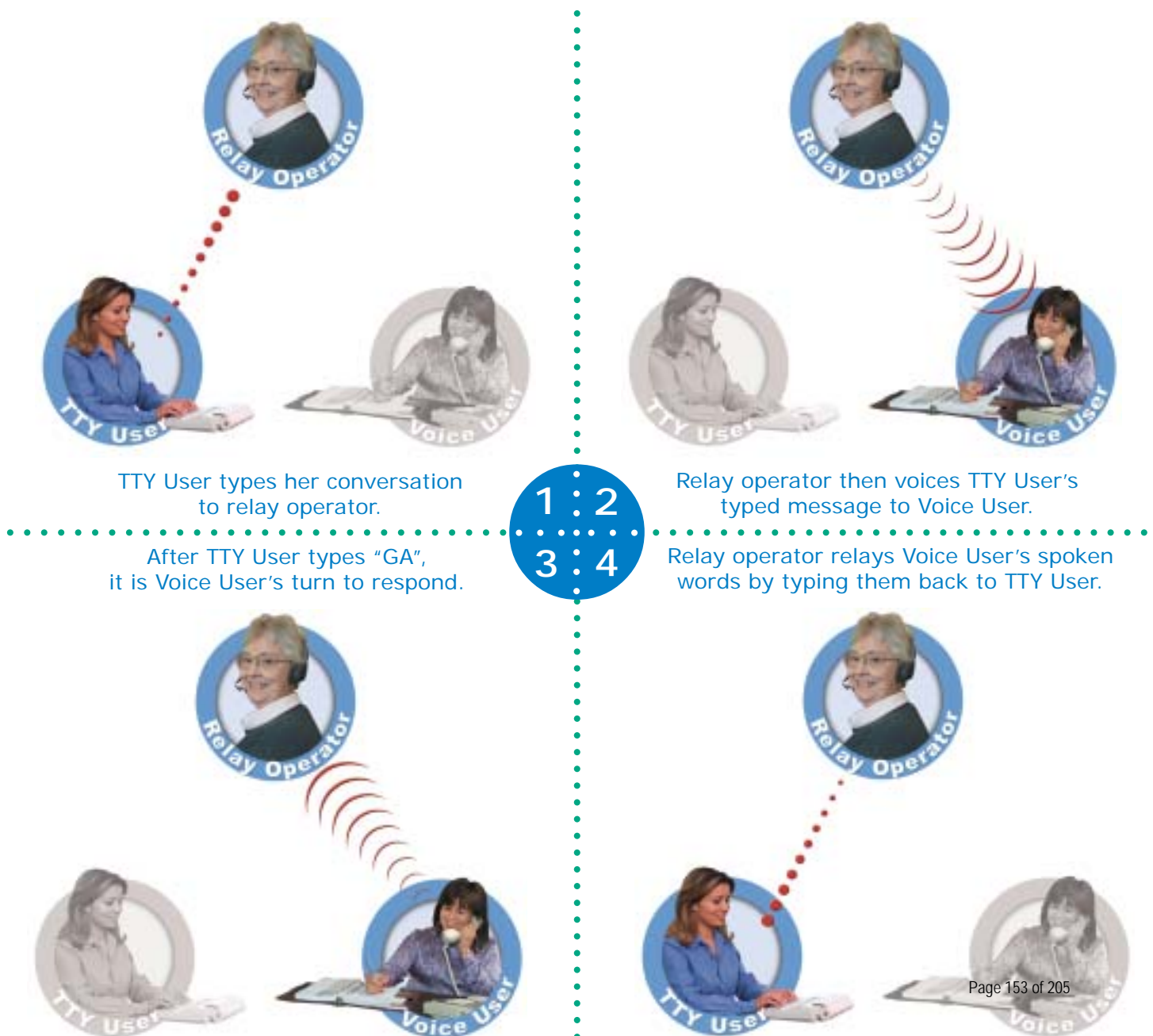
Relay

7 1 1

Full Telephone Accessibility

What is Relay South Carolina?

Relay South Carolina (RSC) is a free service that provides full telephone accessibility to people who are deaf, hard-of-hearing, deafblind, or have a speech disability. This service allows text-telephone (TTY) or special equipment users to communicate with standard (voice) telephone users through specially trained relay operators.

Calls can be made to virtually anywhere in the world, 24 hours a day, 365 days a year with no restrictions on the number, length, or type of calls. All calls are strictly confidential and no records of any conversations are maintained.

RSC service, provided by South Carolina telephone companies through a contract with Sprint, is used to assist communication between people who use TTYs and people who use standard telephones. Specially trained operators facilitate the conversation between the two callers.

How Does Relay Work?

1 — TTY User types her conversation to relay operator.

2 — Relay operator then voices TTY User's typed message to Voice User.

3 — After TTY User types "GA", it is Voice User's turn to respond.

4 — Relay operator relays Voice User's spoken words by typing them back to TTY User.

Easy-to-Remember Relay Number

Dial 7-1-1

7-1-1 is a telephone relay number that allows people who are standard (voice) telephone users, deaf, hard-of-hearing, deafblind or who have a speech disability to access state relay services. Relay users can simply dial 7-1-1 to connect with Relay South Carolina. This allows easier access, particularly for less experienced relay users such as businesses or friends and family of TTY users.

Note:

If you have problems with 7-1-1 when calling through your switchboard (which usually is a PBX telephone system), you may need to contact your PBX administrator to have the system configured to allow 7-1-1 dialing.

If you are not on a PBX telephone system, and you cannot access Relay South Carolina when dialing 7-1-1, call a customer service representative at your local telephone company. It is possible that your local telephone company may not have established 7-1-1 dialing through their system.

PBX telephone systems are usually available at hotels, businesses, agencies, offices, etc. with extension numbers. And most often, a way around this issue is to dial the full 10-digit toll-free number.

If you continue to experience difficulties in dialing 7-1-1, contact the Relay South Carolina Account Manager, Missy Whatmough McManus, at:

melissa.mcmanus@sprint.com

7-1-1 Available:

- **TTY to Voice**
- **Voice to TTY**
- **Voice Carry-Over**
- **Hearing Carry-Over**
- **Spanish Relay**
- **TeleBraille**

7-1-1 Not Available:

- **Speech-to-Speech**
- **CapTel**™
- **Sprint IP Relay**
- **Sprint Video Relay**

Emergency 9-1-1

In case of emergency, TTY users should call directly the TTY-equipped center or emergency services center in their community.

The 9-1-1 operators have TTY machines and are trained to respond to all needs of people in South Carolina including those who are deaf or have hearing loss. 7-1-1 is **NOT** a substitute for deaf, hard-of-hearing, deaf-blind, and speech-disabled residents who need emergency services.

7-1-1 is NOT an emergency number.

7-1-1 should not be confused with 9-1-1.

HOWEVER, if you use a TTY and cannot obtain emergency services on 9-1-1, you may call 7-1-1 and tell the relay operator you have an emergency situation. The operator will then voice your emergency to the South Carolina State Police.

Dial and Converse Easily

TTY to Voice

7 • 1 • 1

1 • 800 • 735 • 8583
(Toll-Free South Carolina)

1 • 800 • 877 • 8973
(Toll-Free National – Sprint)

Some people who are deaf, hard-of-hearing, or deafblind use a TTY to type their conversation to a relay operator, who then reads the typed conversation to a hearing person. The relay operator relays the hearing person's spoken words by typing them back to the TTY user.

How to Make a TTY to Voice Phone Call:

1. Dial the TTY relay number.

2. The relay operator will answer with "RSC OPR 2345" (for relay operator identification), "F" or "M" (for relay operator gender) and "GA." ("GA" denotes "Go Ahead.")

3. Type in the area code and telephone number you wish to call and then type "GA."

4. The relay operator will dial the number and relay the conversation to and from your TTY. Type in "GA" at the end of each message.

5. When you finish the conversation, type "SK" for "Stop Keying" then hang up.

Voice to TTY

7 • 1 • 1

1 • 800 • 735 • 2905
(Toll-Free South Carolina)

1 • 800 • 877 • 8973
(Toll-Free National – Sprint)

Standard telephone users can easily initiate calls to TTY users. The relay operator types the hearing person's spoken words to the TTY user and reads back the typed replies.

Tips for Hearing Callers:

- Be sure to talk **directly** to your caller, **avoid** saying "tell him" or "tell her".

- **Say** "**GA**" or "**Go Ahead**" at the end of your response.

- **Say** "**SK**" or "**Stop Keying**" before you hang up.

How to Make a Voice to TTY Phone Call:

1. Dial the Voice relay number.

2. You will hear, "Relay South Carolina Operator (number). May I have the number you are calling, please?"

3. Give the relay operator the area code and telephone number you wish to call and any further instructions.

4. The relay operator will process your call, relaying exactly what the TTY user is typing. The Relay operator will relay exactly what you say back to the TTY user.

5. When you finish the conversation and are going to hang up, say "SK" or "Stop Keying" then hang up.

Equal Accessibility

TeleBraille

Deafblind relay users often use special TTYs equipped with TeleBraille. Specially trained relay operators are familiar with deafblind users and trained to provide effective solutions to their calling needs.

Text Pacing:

This feature is specific to TeleBraille users. During these relay calls, the relay operator will type at a regular pace. The message comes across on the user's TeleBraille at a rate of 15 words per minute. This allows the user to achieve a more readable rhythm. It is set at this default words-per-minute rate unless the deafblind user requests increased or decreased rates of text in increments of 5 words per minute.

7 • 1 • 1

1 • 800 • 735 • 8583
(Toll-Free South Carolina)

How to Make a TeleBraille Phone Call:

Deafblind User types the conversation to relay operator. Relay operator voices the typed message to Voice User.

Relay operator types the Voice User's conversation to Deafblind User. Deafblind User "reads" the conversation through a TeleBraille device.

Spanish Relay

Relay South Carolina offers **Spanish Relay** service. TTY users can type in Spanish and the conversations will be relayed in Spanish. TTY users can also request Spanish-to-English or English-to-Spanish translation. To make a Spanish relay call, dial the Relay South Carolina number and instruct the relay operator how you want your call translated.

7 • 1 • 1

1 • 800 • 877 • 1229
(Toll-Free South Carolina)

1 • 800 • 435 • 8590
(Toll-Free National – Sprint)

How to Make a Spanish Relay Call:

Relay operator voices TTY User's typed message in Spanish to Voice User.

Relay operator relays Voice User's spoken words in Spanish by typing them back to TTY User.

Talk With Ease

Speech-to-Speech

Speech-to-Speech (STS) allows a person with a speech disability to voice their conversation. A specially trained Relay South Carolina operator will listen and repeat the speech-disabled user's dialogue to the called party. You do not need special equipment to use this service.
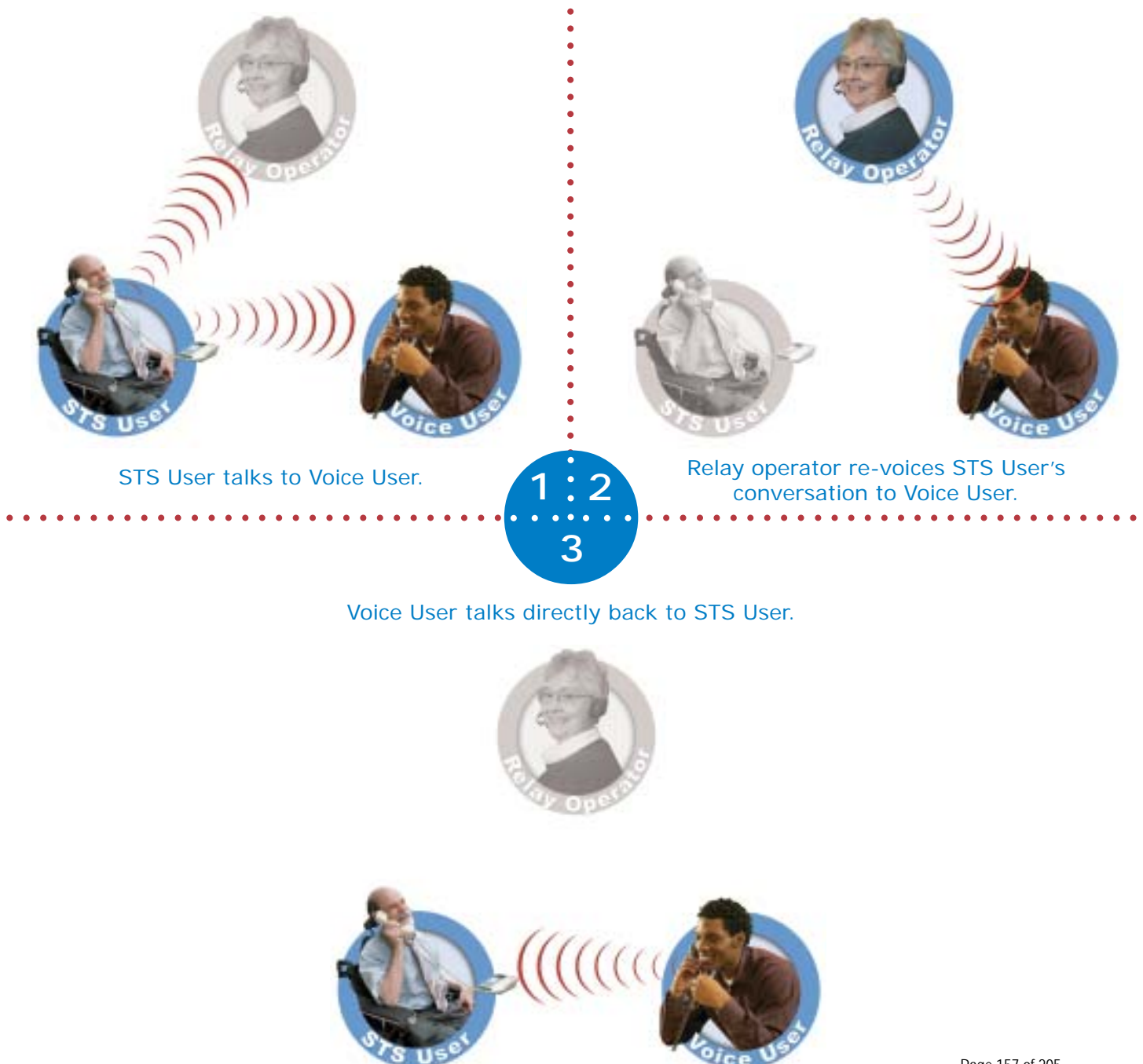
7 • 1 • 1 is not available.

1 • 877 • 735 • 7277
(Toll-Free South Carolina)

1 • 877 • 787 • 2660
(Toll-Free National – Sprint)

How to Make an STS Phone Call:

1

STS User talks to Voice User.

2

Relay operator re-voices STS User's conversation to Voice User.

3

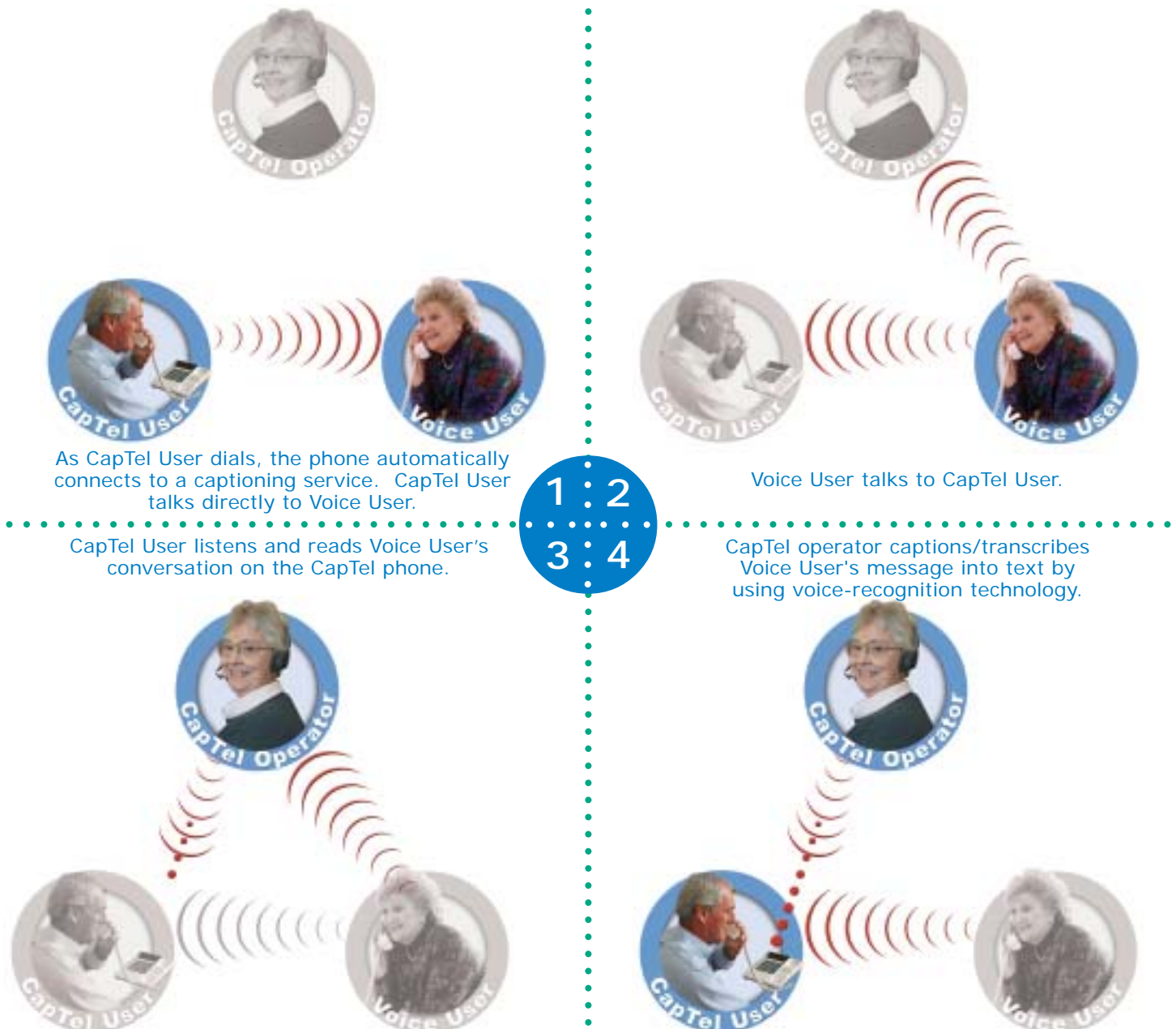Voice User talks directly back to STS User.

CapTel™

CapTel phone users place a call in the same way they would when using a traditional phone—by dialing the number directly. The CapTel phone automatically connects to Sprint's captioning relay service as you dial on a two-line system. When the person you're calling answers, you hear what they say with the assistance of two amplification buttons and read the captions—or words—on the CapTel phone's display screen.

For CapTel Callers:
Dial the person you are calling directly

For Hearing Callers:
1•877•243•2823

How to Make a CapTel Phone Call:

1 As CapTel User dials, the phone automatically connects to a captioning service. CapTel User talks directly to Voice User.

2 Voice User talks to CapTel User.

3 CapTel User listens and reads Voice User's conversation on the CapTel phone.

4 CapTel operator captions/transcribes Voice User's message into text by using voice-recognition technology.

** CapTel users are responsible for their own long-distance charges. However, there is no charge for using the CapTel service. For information on how to qualify for a CapTel phone contact the SC Telecommunications Equipment Distribution Program at: local 803-896-8337 (Voice) or 803-896-8334 (TTY) or toll-free 877-225-8337 (Voice) or 877-889-8337 (TTY). An application is available online at: **www.scsdb.k12.sc.us**

Talk With Confidence

Voice Carry-Over

Voice Carry-Over (VCO) is a service that enables a hard-of-hearing or deaf user to use their voice to speak directly to hearing person.

When the hearing person speaks to VCO user, the relay operator will serve as their "ears" and type everything said that will appear on a TTY or text display equipment.

7 • 1 • 1

1 • 877 • 735 • 8263
(Toll-Free South Carolina)

1 • 877 • 826 • 2255
(Toll-Free National – Sprint)

How to Make a VCO Phone Call:

1 VCO User talks to Voice User directly.

2 After VCO User says, "Go Ahead", it is Voice User's turn to respond.

3 Voice User talks to VCO User while the relay operator types Voice User's message.

4 VCO User reads the message on the TTY or text display equipment.
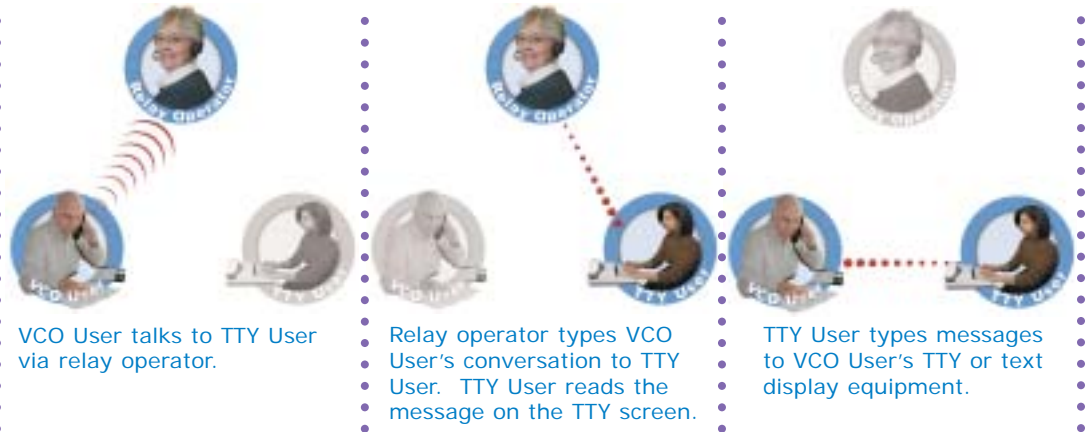
The relay operator specializes in all types of Voice Carry-Over calls, such as VCO Direct, VCO to TTY, VCO to VCO, or Two-Line VCO. With this service, you no longer have to specify your call type to the operator.
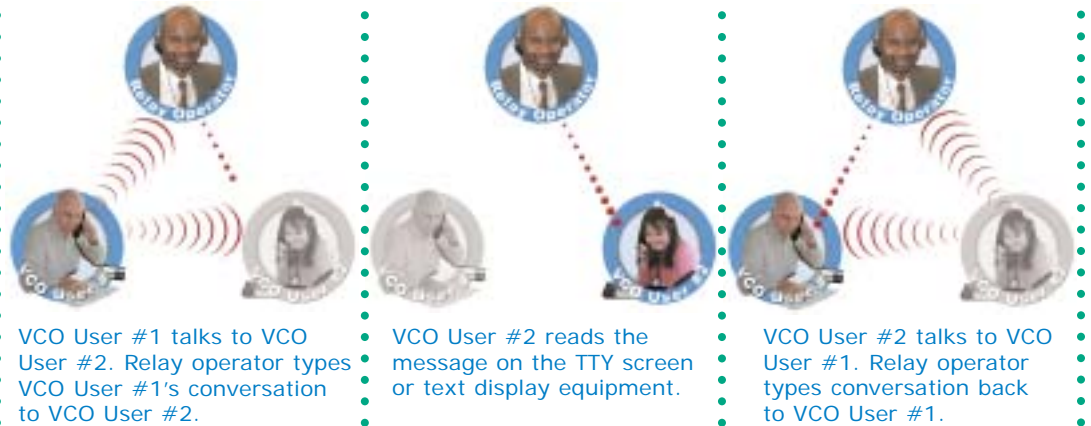
VCO to TTY

The relay operator will type what the Voice Carry-Over User says to the TTY User. The message that the TTY User types will go directly to the VCO User's TTY or text display equipment.

VCO User talks to TTY User via relay operator.

Relay operator types VCO User's conversation to TTY User. TTY User reads the message on the TTY screen.

TTY User types messages to VCO User's TTY or text display equipment.

VCO to VCO

The relay operator will serve as both Voice Carry-Over Users' "ears" and type what the other person says. This is for people who have a VCO phone without a text display equipment or don't wish to type.

VCO User #1 talks to VCO User #2. Relay operator types VCO User #1's conversation to VCO User #2.

VCO User #2 reads the message on the TTY screen or text display equipment.

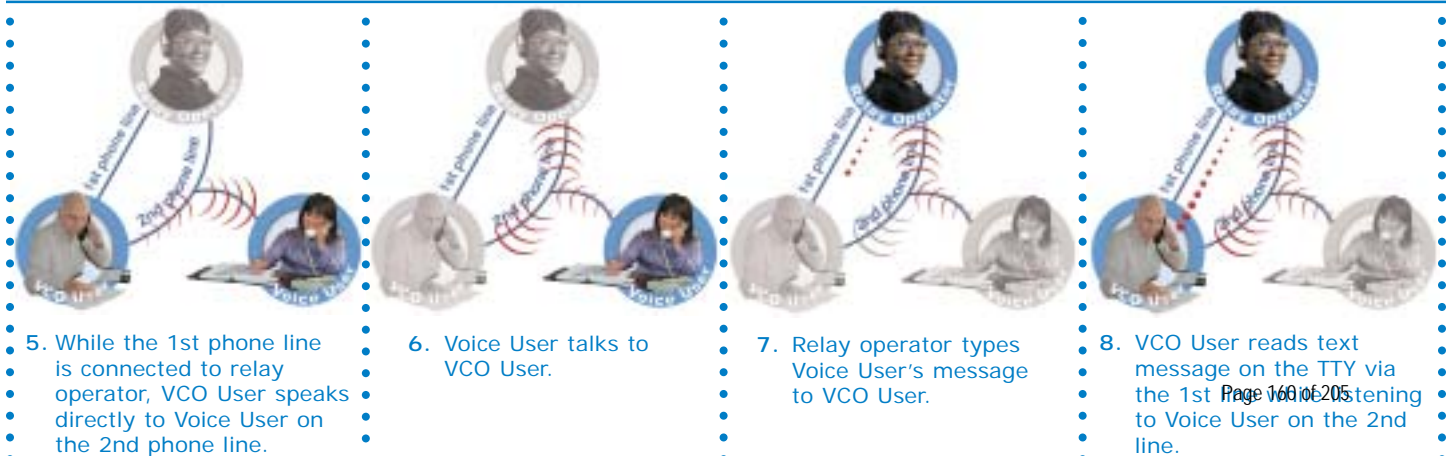VCO User #2 talks to VCO User #1. Relay operator types conversation back to VCO User #1.

Two-Line Voice Carry-Over

Two-line VCO allows a deaf or hard-of-hearing person with two telephone lines to use one line for speaking directly to a hearing person while the second line is used to receive the hearing person's typed responses.

How to Make a Two-Line VCO Phone Call:

1. Dial the Relay South Carolina number on line #1 and type, "TWO LINE VCO PLS CALL ME BACK ON (provide VCO User's telephone number on line #2)".

2. The relay operator will call VCO User back on line #2. Pick up the line #2 phone and then press the flash button or switch-hook to obtain a second dial tone.

3. Dial Voice User's number.

4. Press the flash button or switch-hook to reconnect the operator to being VCO User's conversation.

5. While the 1st phone line is connected to relay operator, VCO User speaks directly to Voice User on the 2nd phone line.

6. Voice User talks to VCO User.

7. Relay operator types Voice User's message to VCO User.

8. VCO User reads text message on the TTY via the 1st
listening to Voice User on the 2nd line.

Listen With Clarity

Hearing Carry-Over

Hearing Carry-Over (HCO) allows speech-disabled users with hearing to listen to the person they are calling. The HCO user types the conversation for the relay operator to voice to the standard telephone user.
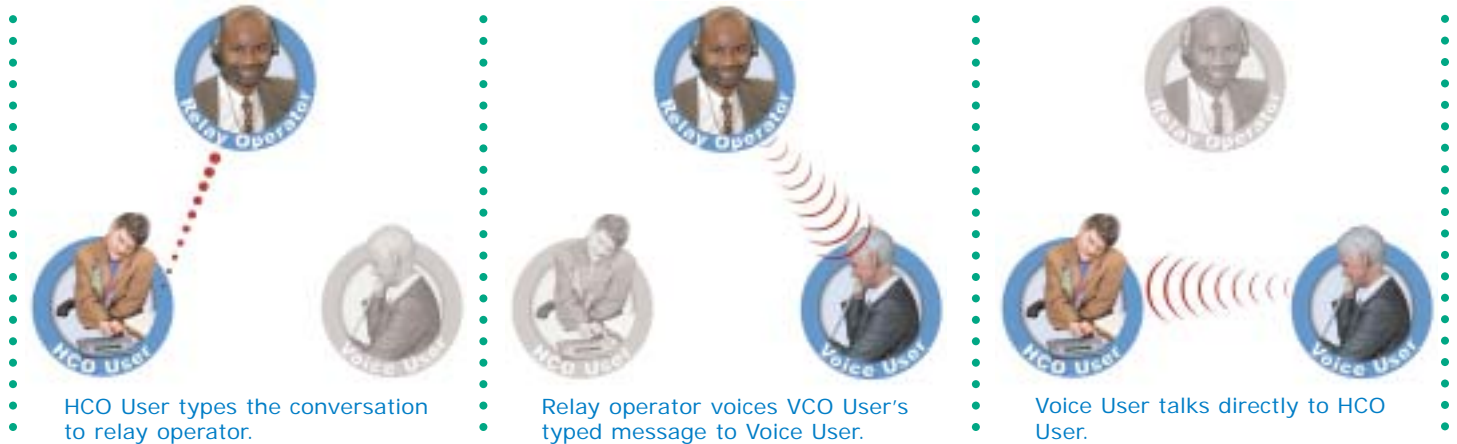
7 • 1 • 1

1 • 8 0 0 • 7 3 5 • 8 5 8 3
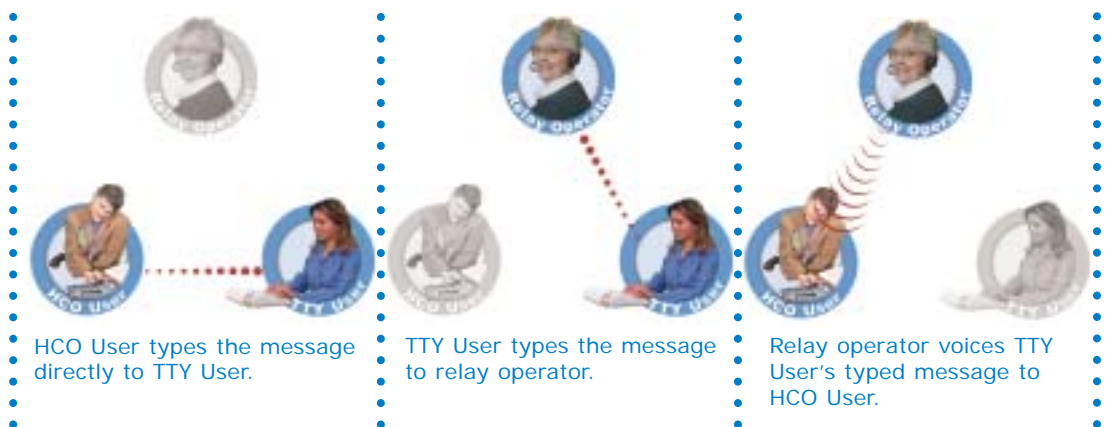(Toll-Free South Carolina)

1 • 8 0 0 • 8 7 7 • 8 9 7 3
(Toll-Free National – Sprint)

How to Make an HCO Phone Call:

HCO User types the conversation to relay operator.

Relay operator voices VCO User's typed message to Voice User.

Voice User talks directly to HCO User.

HCO to TTY

HCO Users can listen while the relay operator is voicing the TTY user's typed message. The HCO User types the conversation directly to the TTY user.

HCO User types the message directly to TTY User.

TTY User types the message to relay operator.

Relay operator voices TTY User's typed message to HCO User.

HCO to HCO

HCO Users can contact other HCO Users. The relay operator will voice to both parties what is typed on each user's TTY.

HCO User #1 types the conversation to relay operator. Relay operator voices the typed message by HCO User #1 to HCO User #2.

HCO User #2 types the conversation to HCO User #1. Relay operator voices the typed message by HCO User #2 to HCO User #1.
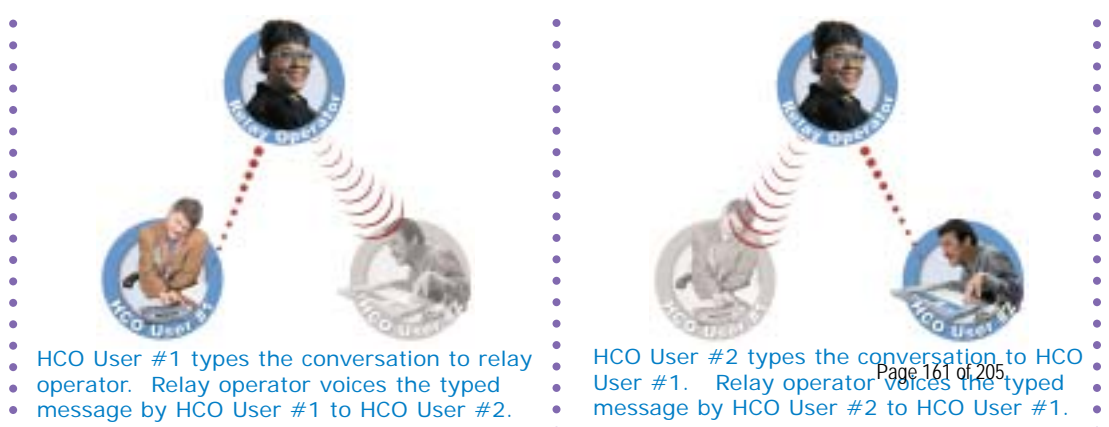
Video Relay

Communicate Easily

Sprint Video Relay Service (VRS), is a service that provides sign language users the opportunity to communicate by video conferencing using their native language.

For Hearing Callers:

1•866•410•5787

Give the Video Interpreter (VI) one of the following for the person you are calling:
- IP Address
- Sprint VRS Mail extension number
- ISDN number

VRS Operating Hours:
- 24 hours a day,
- 7 days a week,
- 365 days a year.

ISDN Hours:
- 24 hours a day,
- 7 days a week,
- 365 days a year.

Spanish VRS Operating Hours:
- Monday through Friday 6:00 AM to 7:00 PM (Central Time)

Videophone and TV only

If you are calling VRS through your **videophone** and **TV**:

sprintvrs.tv

Webcam and PC only

If you are calling VRS through your **webcam** and **computer**:

www.rscvrs.com

911 Calls

During emergency situations, dialing 911 directly is the most reliable method to access emergency services via TTY or phone.

Connect Beyond Boundaries

Internet Relay

Sprint IP Relay is a service offered to deaf and hard-of-hearing individuals. This service allows them to place relay calls over the Internet via their computer or laptop. Sprint IP Relay is a free service funded by the Interstate Telecommunications Relay Service (TRS) fund.

How to Make a Sprint IP Relay Call:

1. Connect at: **www.sprintip.com**

2. Type in the phone number you wish to call.

3. Click on the yellow "Call Now" button.

4. The relay operator will dial the number.

5. The relay operator will relay the conversation to and from your computer/laptop.

6. Type "GA" at the end of each message.

7. When you finish the conversation, type "SK".

8. Click on the "Disconnect Call" icon on the lower right of the screen.

9. The message "Your call has been disconnected. Thank you for using Sprintip.com" appears on the screen letting you know that the call has been disconnected.

Anytime, Anywhere, Anyhow

AIM® Relay

To use the service, people who are deaf or hard-of-hearing send an instant message to the AIM® Screen Name "**SprintIP**" to contact a Sprint IP relay operator. The relay operator then places a telephone call to the hearing caller and relays the conversation between the two parties, reading the instant messages out loud to the hearing caller and typing the responses back via instant message to the deaf caller.

The "**SprintIP**" Screen Name can be added to the Buddy List feature as a permanent buddy, and consumers can initiate Sprint IP Relay calls directly through the AOL® and AIM® services.
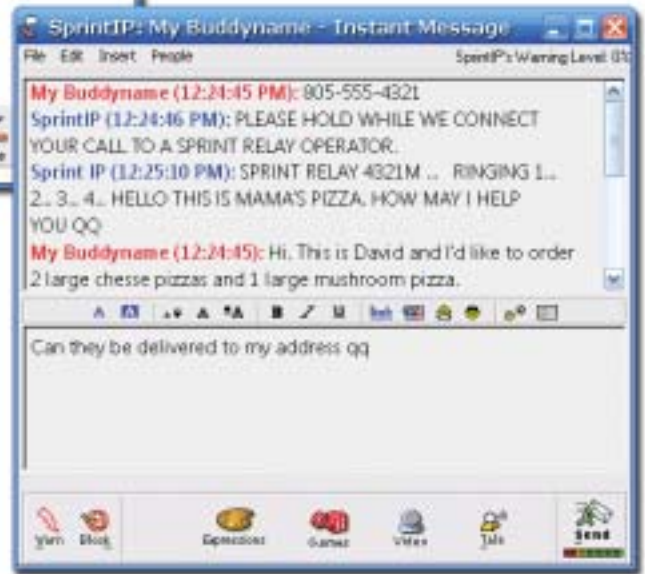
How Does AIM® Relay Work:

- Go to AIM® and send an IM to the screen name "**SprintIP**" to make a relay call!

- Save **SprintIP** in your Buddy list and the next time you make a call, it will be at your fingertips!

- Type "**Español**" to connect with a Spanish-language relay operator!

- Type "**Help**" to connect to Sprint Relay Customer Service.

- Easy and convenient! No "GA" needed.

- Place **Sprint IP** relay calls with your Blackberry, Treo and Sidekick device or with ANY device that runs AIM®.

TTY Payphone

The Federal Communications Commission (FCC) issued an order outlining an access to **public payphone** service through relay services.

The order states that:

- All local calls from TTY payphones are free of charge.
- Toll calls can be billed through calling cards and prepaid cards.

TTY users who wish to use a coin TTY payphone can use Relay South Carolina to assist in connecting calls. There are several ways to bill non-local calls:

- Collect
- Third party
- Calling card
- Prepaid card

7 • 1 • 1

1 • 800 • 877 • 8973
(Toll-Free National – Sprint)

Answering Machine Retrieval

The TTY User can request the relay operator to **retrieve voice messages** from the answering machine.

Relay South Carolina **DOES NOT** enter a "CALL TO" number.

1. Place your phone handset on the speaker part of the answering machine until all messages have been retrieved.

2. Place the phone handset back on the TTY and type "GA."

3. Relay operator will type your messages.

7 • 1 • 1

1 • 800 • 735 • 8583
(Toll-Free South Carolina)

900 Services

Relay South Carolina provides a **toll-free 900 number** that connects relay callers to any 900 or 800 Pay-Per-Call service.

NOTE:

The caller is responsible for direct billing.

How to Make 900 Phone Call:

1. Relay users dial a separate toll-free 900 number to connect with Relay South Carolina.

2. Relay operator will dial the requested outbound 900 or 800 Pay-Per-Call service number.

3. Upon connection to the 900 number, billing procedures will begin.

1 • 900 • 535 • 3323

NOTE:

Billing procedures may apply differently depending upon the pay-per-call service called.

For further assistance with 900 calls, call Relay South Carolina 24-hour Customer Service at 1-800-676-3777 (TTY/Voice)

Directory Assistance

Relay South Carolina will relay **Directory Assistance (DA)** calls between TTY users and the Local Exchange Carrier (LEC) DA operator. Once the caller makes the request, the relay operator will contact the appropriate LEC DA operator. After obtaining the number, the caller may choose to place the call through Relay South Carolina or dial directly from TTY to TTY.

International Calls

Relay South Carolina allows you to place and receive calls to and from **anywhere in the world** (using English or Spanish).

Callers from a country outside the United States may also access Sprint Relay via 1-605-224-1837.

1 • 605 • 224 • 1837

ASCII

Computer users can access Relay South Carolina directly. **ASCII Split Screen** is designed to allow high-speed ASCII computer users and relay operators to type their conversations which can be viewed on split windows. ASCII users can interrupt the relay operator (and by the voice party) if needed.

If your computer has 1200 Baud or up, use these settings:
- 8 Bits
- No Parity
- 1 Stop Bit
- Full Duplex

If your computer has 300 Baud or below, use these setting:
- 8 Bits
- No Parity
- 1 Stop Bit
- Half Duplex

7 • 1 • 1

1 • 8 0 0 • 7 3 5 • 7 2 9 3
(Toll-Free South Carolina)

Equipment Distribution Program

South Carolina Telecommunications Equipment Distribution Program (SC TEDP) is a program that enables free equipment to be provided for South Carolina residents with hearing, speech, or blind / low-vision disabilities. Individuals who are experiencing difficulty using their current telephone equipment are encouraged to apply to receive assistive equipment through the SC TEDP.

The program is offered as an outreach service of the South Carolina School for the Deaf and the Blind (SCSDB) in partnership with the Office of Regulatory Staff.

What Type of Equipment and Services Are Available?

The program provides a wide range of equipment. Some examples of the equipment include:

- amplified telephones
- TTYs
- artificial larynx
- alerting devices

Training and equipment installation is provided at no charge.

Who Qualifies for the Program?

South Carolina residents who have phone service in their home and a certified disability that causes difficulty using a standard telephone are qualified. A professional must certify that the individual can benefit from special telephone equipment.

An application is available online at: www.scsdb.k12.sc.us
- Click on the Outreach/Resources button.
- Scroll down.
- Click on the SC Telecommunications Equipment Distribution Program hyperlink.

Relay South Carolina		South Carolina	National – Sprint
Voice Caller	7-1-1	1-800-735-2905	1-800-877-8973
TTY Caller	7-1-1	1-800-735-8583	1-800-877-8973
Voice Carry-Over	7-1-1	1-877-735-8263	1-877-826-2255
Hearing Carry-Over	7-1-1	1-800-735-8583	1-800-877-8973
Spanish	7-1-1	1-800-877-1229	1-800-435-8590
Speech-to-Speech		1-877-735-7277	1-877-787-2660
TeleBraille	7-1-1	1-800-735-8583	

	TTY Users	7-1-1 1-800-735-8583 (Toll-Free South Carolina) 1-800-877-8973 (Toll-Free National – Sprint) For more information: **www.relaysouthcarolina.com/tty.htm**
	Hearing Users	7-1-1 1-800-735-2905 (Toll-Free South Carolina) 1-800-877-8973 (Toll-Free National – Sprint) For more information: **www.relaysouthcarolina.com/voice.htm**
	TeleBraille Relay	7-1-1 1-800-735-8583 (Toll-Free South Carolina) For more information: **www.relaysouthcarolina.com/telebraille.htm**
	Spanish Relay	7-1-1 1-800-877-1229 (Toll-Free South Carolina) 1-800-435-8590 (Toll-Free National – Sprint Spanish to Spanish) For more information: **www.relaysouthcarolina.com/spanish.htm**
	Voice Carry-Over (VCO)	7-1-1 1-877-735-8263 (Toll-Free South Carolina) 1-877-826-2255 (Toll-Free National – Sprint) For more information: **www.relaysouthcarolina.com/vco.htm**
	Hearing Carry-Over (HCO)	7-1-1 1-800-735-8583 (Toll-Free South Carolina) 1-800-877-8973 (Toll-Free National – Sprint) For more information: **www.relaysouthcarolina.com/hco.htm**
	Speech-to-Speech (STS)	7-1-1 is not available 1-877-735-7277 (Toll-Free South Carolina) 1-877-787-2660 (Toll-Free National – Sprint) For more information: **www.relaysouthcarolina.com/sts.htm**
	Sprint IP Relay	http://www.sprintip.com For more information: **www.relaysouthcarolina.com/iprelay.htm**
	Sprint Video Relay	Videophone & TV only: sprintvrs.tv Webcam & PC only: www.rscvrs.com For Hearing Callers: 1-866-410-5787 For more information: **www.relaysouthcarolina.com/vrs.htm**
	CapTel™	For CapTel Caller: Dial the person you are calling directly For Hearning Callers: 1-877-243-2823 For more information: **www.relaysouthcarolina.com/captel.htm**
	900 Services	1-900-535-3323 (Toll-Paid South Carolina) For more information: **www.relaysouthcarolina.com/900.htm**
	Sprint Relay Customer Service	1-800-676-3777 (TTY/Voice/ASCII) 1-800-676-4290 (Spanish - TTY/Voz/ASCII) Sprint.TRSCustServ@sprint.com (E-mail)

RSC Website	www.relaysouthcarolina.com
Sprint Video Relay	Computer & Webcam ...... www.rscvrs.com
	T.V. & Videophone .... sprintvrs.tv
	For Hearing 1-866-410-5787
Sprint IP Relay	www.sprintip.com
Sprint Relay Customer Service	1-800-676-3777 (TTY/Voice/ASCII) 1-800-676-4290 (for Spanish customers) Sprint.TRSCustServ@sprint.com (E-mail)

- Cut the card.
- Put in your wallet.
- Use it when you call someone via Relay South Carolina.

Appendix Q

State Legislation Establishing TRS program in SC

ARTICLE 21.

TELEPHONE SERVICE FOR HEARING AND SPEECH IMPAIRED PERSONS

SECTION 58-9-2510. Definitions.

As used in this article:

(1) "Commission" means the Public Service Commission.

(2) "Deaf person" means an individual who is unable to hear and understand oral communication, with or without the assistance of amplification devices.

(3) "Dual party relay system" or "DPR" means a procedure in which a deaf, hearing, or speech impaired TDD user can communicate with an intermediary party, who then orally relays the first party's message or request to a third party, or a procedure in which a party who is not deaf or hearing or speech impaired can communicate with an intermediary party who then relays the message or request to a TDD user.

(3.5) "Dual sensory impaired person" means an individual who is deaf/blind or has both a permanent hearing impairment and a permanent visual impairment.

(4) "Hard of hearing person" means an individual who has suffered a permanent hearing loss which is severe enough to necessitate the use of amplification devices to hear oral communication.

(5) "Hearing impaired person" means a person who is deaf or hard of hearing.

(6) "Operating fund" means the Dual Party Relay Service Operating Fund which is a specific fund to be created by the commission and established, invested, managed, and maintained for the exclusive purpose of implementing the provisions of this chapter according to commission regulations.

(7) "Regulatory staff" means the executive director or the executive director and the employees of the Office of Regulatory Staff.

(8) "Speech impaired person" means an individual who has suffered a loss of oral communication ability which prohibits normal use of a standard telephone handset.

(9) "Telecommunications device" or " telecommunications device for the deaf, hearing, or speech impaired" or "TDD" or "TTY" means a keyboard mechanism attached to or in place of a standard telephone by some coupling device used to transmit or receive signals through telephone lines.

SECTION 58-9-2520. Statewide access program.

(A) The commission may establish and the Office of Regulatory Staff may administer and promote a statewide program to provide telephone access to persons who are speech or hearing impaired.

(B) The program may include, but is not limited to:

(1) a statewide dual party relay service;

(2) selection by the Office of Regulatory Staff of a service provider to provide a statewide relay system to handle all intrastate TDD calls;

(3) a distribution system as provided by the Office of Regulatory Staff of TTY's and other related telecommunications devices; and

(4) prescribing or promulgating procedures, regulations, guidelines, and criteria to establish, implement, administer, regulate, and promote all aspects of the dual party relay service and the distribution of TTY and other related telecommunications devices, and the establishment of a funding mechanism to cover all associated costs of these services and this article where not prohibited by law.

The administration, implementation, and promotion of the dual party relay service and the distribution of TTY and other related telecommunications devices is the responsibility of the Office of Regulatory Staff. The administration of the funding mechanism is the responsibility of the Office of Regulatory Staff.

(C) The commission and the Office of Regulatory Staff may use assistance from state and federal agencies or from private organizations and industry to accomplish the purposes of this article.

SECTION 58-9-2530. Funding; telephone surcharge; relay service user charges.

(A) The commission may require all local exchange telephone companies operating in this State to impose a monthly charge not to exceed twenty-five cents on all residential and business local exchange access facilities as necessary to fund the establishment and operation of a dual party relay system and a

distribution system of TTY's and other related telecommunications devices in this State. The amount of the charge must be determined by the commission based upon the amount of funding necessary to accomplish the purposes of this article and provide dual party telephone relay services on a continuous basis. If assessed, the local exchange companies shall collect the charge from their customers and transfer the monies collected to the operating fund, which must be administered by the Office of Regulatory Staff. The charge collected and remitted by the local exchange companies is not subject to any tax, fee, or assessment, nor may it be considered revenue of the local exchange companies. The commission may provide for the funding of the dual party relay system through contributions from other sources. The fund must be established, invested, and managed for the exclusive purpose of implementing the provisions of this article according to regulations promulgated by the commission.

(B) Monies in the operating fund must also include appropriations made by the General Assembly for the purpose of this chapter, grants from other governmental or private entities, and contributions or donations received by the commission for the dual party relay service. All monies in the operating fund must be used solely for the administration and operation of a statewide program to provide telecommunications access to persons who are speech and hearing impaired or similarly impaired.

(C) The users of the relay service must be charged for telephone services, including any authorized commission charge, without additional charges for the use of the relay service. The calling or called party shall bear an expense for making intrastate nonlocal calls considered approved by the commission as being equitable in comparison with non-TDD or DPR service customers.

SECTION 58-9-2540. Advisory committee.

(A) The commission may appoint an advisory committee to monitor the statewide telecommunications relay access service and advise and make recommendations to the commission in pursuing services which meet the needs of the hearing or speech impaired and others similarly impaired in communicating with other users of telecommunications services.

(B) The advisory committee consists of seven members as follows:

(1) one representative from the South Carolina School for the Deaf and the Blind;

(2) one representative from the South Carolina Association of the Deaf, Inc.;

(3) one representative from the South Carolina Telephone Association;

(4) one representative from the provider of the dual party relay service;

(5) one representative from the Office of Regulatory Staff;

(6) one representative from the office of the Chief Information Officer, State Budget and Control Board; and

(7) one hearing-impaired person who is an active member of Self-Help for Hard of Hearing People (SHHH).

The advisory committee must be appointed by the commission upon the recommendations of the applicable agency or organization. The commission shall prescribe regulations which set forth guidelines for the responsibilities, duties, and authority of the committee. Members shall serve at the pleasure of the commission and vacancies must be filled in the manner of the original appointment.

SECTION 58-9-2550. Distribution systems.

The Office of Regulatory Staff may establish a distribution system for TTY and other related telecommunications devices. In establishing this program, the Office of Regulatory Staff may:

(1) select an administrator through the State Budget and Control Board procurement process to purchase, store, distribute, and maintain telecommunications devices for persons qualified to receive such equipment. In addition, the administrator must be responsible for providing user training and assistance; and

(2) establish qualifications for eligibility for individuals to receive TTY's and other related telecommunications devices under a distribution system of TTY's and other related telecommunications devices. Qualifications shall include certifications as hearing impaired, speech impaired, or dual sensory impaired.

Appendix R

Copies of Complaint Logs

June 26, 2006

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, Southwest
Room TW-B204
Washington, DC 20554

Re: CG Docket 03-123: Annual Summary of Consumer Complaints Concerning TRS
        for the State of South Carolina

Dear Ms. Dortch:

The Office of Regulatory Staff, TRS Administrator for South Carolina, and Sprint, TRS
provider for South Carolina, have compiled the consumer complaint information
requested under CG Docket No. 03-123 for the 12 months ending May 31, 2006. As
required, this filing includes one original, four copies and two electronic disk copies.
In addition, Sprint will provide the FCC call volume information under seal as stated in
the attached June 15, 2006 letter.

Should you have any questions regarding this filing, please contact me at 803/737-0808.

Sincerely,

Katie Morgan
Director
Telecommunications, Water/Wastewater and Transportation

Cc: Ms. Pam Gregory
        Federal Communications Commission
        Consumer & Governmental Affairs Bureau

Enclosures

<u>Relay South Carolina Service – June 1, 2005 through May 31st, 2006</u>

1. Total Number of TRS complaints: 24

Complaints Tracking for South Carolina
TOTAL: 24

Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
Jul-05			
6/3/2005	TTY customer had to say the number twice, the agent didn't see the number the first time. TTY customer typed, "Hi, live customer rep. at (toll free number) ga" and agent typed, "Opr. xxxx". TTY customer typed back, "I said it is (toll free nbr) speaking with a live customer service rep. please" and then the agent dialed the requested number. Follow-up requested.	6/3/2005	Apologized to the customer. Met with the agent who stated the call did not connect so she switched to voice line and didn't get a response. Agent switched back to the data line then the call connected. Then agent had to ask for the number. Agent followed procedures. Followed up with customer by phone and explained that the relay agent was following procedure. Customer was satisfied and thanked for the follow up.
Jul-05			
07/25/05	VCO customer called to say that the agent IDs are not sending when he gets incoming calls. He only gets the "voice (or type) now" part of greeting. When he tries to talk to the agents, they do not respond. This has been happening for about a month now. Follow-up requested.	07/25/05	Apologized. Opened TT #198418. Garbling problems on customer's end. Referred customer to his LEC so that customer can be routed to 711. Account Manager called customer and customer was satisfied with Relay services since after this agent ID problem was resolved. Also, garbling problems ceased when the Relay agent or TTY user turned off Turbo Code and pacing set up to 35 wpm.
07/28/05	Caller said on her call at 4:24 PM today (7/28/05) the agent during the call typed to caller "was not able to type entire msg..." There was silence and then agent hung up on caller. Customer wants follow up from agent's supervisor to clarify what happened on this call.	07/28/05	Apologized to customer. Trainer met with agent who remembered losing a signal when the center experienced a power loss. Trainer followed up with customer by phone explaining the center experienced a power loss during the time this call was placed and apologized for the inconvenience. The customer was very understanding and thanked for the follow up.
Aug-05			
08/09/05	A TTY customer called to say that the agent did not follow her instructions on what to do if an answering machine came on. Also, the agent did not type well; the agent typed too many "X"s so the customer was not able to read what was said. Follow up requested.	08/09/05	Apologized for the handling of the call. Trainer met with the agent and coached agent on the importance of slowing down the typing if needed to reduce errors. Agent understands. Followed up with customer via phone on 8/11/05 and explained that the agent was coached on the importance of slowing down typing if needed in order to reduce errors. Customer was satisfied.
08/10/05	Caller reports that he is not receiving entire relay greeting at the beginning of incoming calls. He answers VCO by saying "Hello VCO GA". The agent begins typing what the caller is saying before the entire greeting macro finishes. This cuts off the CA ID number and confuses the caller when the typing suddenly cuts out to something else the caller is saying. This also causes garbling in the text so the message cannot be understood. No follow up requested.	08/10/05	Offered to place a test call through Relay to determine what was causing the problem. The test call concluded that the problem seems to be a training issue. Supervisor met with the agent and coached on the importance of allowing any macro to completely finish before starting to type. Agent understands.
Oct-05			
10/23/05	TTY customer called to say that the agent disconnected her when the outbound caller (voice) disconnected. The agent only typed "(person hung up) sksk." Follow-up requested between 9 am - 11 pm.	10/23/05	Apologized for the inconvenience. Supervisor met with agent and coached on the importance of following correct call-handling procedures. Explained to the agent the inbound customer has caller control and will initiate the disconnection. Agent understands. Followed up with customer via phone on 10/25/05 and advised customer that the agent was coached on proper call-handling procedures. Customer was satisfied.
10/24/05	VCO customer is unable to receive calls. She usually answers, "Hello, GA" but does not receive typing after that. She is able to place calls without problems. No follow-up requested.	10/24/05	Branded customer as VCO user and set up Customer Database Profile. Account Manager called customer 4 times. The first 2 times, customer answered the phone, conversed about 5 minutes, then hung up or phone disconnected. The third time, customer hung up or her phone disconnected in mid-conversation. The fourth time, customer hung up after conversing for a minute. Based on

			observations, it appears that the customer needs a refresher training on how to use her VCO phone. Account Manager emailed to the CapTel AM to contact this customer to establish a re-training review.
10/24/05	TTY customer called to say that she has had difficulty reaching agents when dialing to Relay. She often has to wait "several minutes" and sometimes has to redial to reach an agent. She did not know how long this has been happening, but the last time occurred on 10/24 at 11:09 a.m. Follow-up requested.	10/24/05	Apologized for the inconvenience. Opened up TT #616963. With this Relay call center system, the call gets answered automatically once it arrives here. Internal testing indicates that the customer's TTY does 300 baud, which won't work with VCO (what customer uses). Made attempt to follow up with customer to set her VCO phone to TTY on 11/29/05, left message on TTY. Second attempt made on 11/30/05, left another msg on TTY answering machine. Made contact with customer 12/21/05 and explained that she needed to set her VCO phone to TTY mode and the problem should be resolved. Customer stated that she no longer has a VCO phone and only uses TTY. As a result, she has not been having the problem as much as she had with the VCO phone. Customer was thankful for the call and said if she had any more problems she would be sure to call back.
10/29/05	TTY customer states that the agent dialed out and got a busy signal and then redialed the call without asking the customer if customer wanted to redial. No follow-up requested.	10/29/05	Apologized to customer. Supervisor met with agent and coached on the importance of allowing the customer to make decisions on calls. Agent understands.
10/29/05	TTY customer states that the relay agent did not respond after being given the phone number to dial. Customer waited and typed "GA" several times and "Hello, are you there?" There was no response so the customer disconnected. No follow-up requested.	10/29/05	Apologized to customer. Supervisor met with agent who did not remember this call, however, agent was coached on the importance of responding in a timely manner. Agent understands.
Nov-05			
11/11/05	A TTY user called to say that she got connected to the operator and then got no typing for 5 minutes. Caller had to keep typing "hello" to the operator. Caller does request supervisor follow up.	11/11/05	Apologized for the problem. HR met with agent and appropriate action has been taken. Contacted customer via TTY on 11/21/05 at 3:00 pm and left a message on customer's answering machine that appropriate action has been taken with this agent.
11/30/05	Customer was unable to call number via Sprint Relay number. Customer requests follow up.		Apologized for the problem. Spoke with phone company representative regarding this issue. TT #798373 opened up. Worked with SunCom on this issue. Sprint reconfigured the software and reloaded the LD database. Test calls went through fine. Account Manager called customer, there was no answer nor an answering machine after 10 rings. The next day, the Account Manager left a message and work email address on the customer's answering machine.
Dec-05			
12/16/05	Customer turned in a previous complaint on the problem of Caller ID not working when using relay on 12/10/05 and it is still not working. Also the customer requested a contact and no one ever contacted her about this. Call back requested any time after 4 pm EST.		Apologized for the problem and assured the customer that another complaint and TT would be turned in. Previous TT #854080. New TT #885631. There was an issue with the application, and maintenance was performed. Referred to Research departments for further investigation. Resolved. Account Manager called customer and received the following recorded message: "The number you have reached xxx-xxxx has been changed to a nonpublish number. No additional information is available about xxx-xxxx."
12/30/05	VCO customer is not receiving Caller ID and has not been for about 6 months now. Customer has called repeatedly trying to get this fixed. Follow-up requested.	12/30/05	Apologized, opened up TT #943126. Software issue in which Caller ID was not being passed through Relay. Resolved. Account Manager called customer and there was no answer nor an answering machine after 10 rings. Also emailed customer with resolution.

01/01/06	Customer said that when people call her, they hear fax tones and never get connected. When asked whether it is through Relay, she says she wasn't sure. Would like to see if it's a technical issue. Also mentioned that when hospitals try to call 711, it does not go through. Wanted to know if there is a way to re-route calls to go through Relay; i.e., if they call her number directly, can be be transferred to Relay. Follow up requested at any time and permissible to leave a message.	01/01/06	Issue will be investigated to see if it is fax and not TTY tones. Gave the 800 voice number for her to give out. Account Manager left a message on customer's TTY answering machine. Gave customer the 800-735-2905 toll-free SC number again for hearing persons to use to reach her on the TTY. Also explained to customer that the hospital will need to have a technician to go into its PBX system to open up the line for the Relay number 711 to be accessible. Left my work email address should customer need to contact me.
01/04/06	VCO customer says that Caller ID is still not working for any incoming Relay calls for over a week after she provided requested information. Customer wants contact from Account Manager with the resolution.	01/04/06	Apologized and explained that the technicians are working on the issue. Entered TT #962096. (Same customer with the same issue on TT #943126.) Software issue, the Research departments continue to work on it. Solved. Account Manager called customer and there was no answer nor an answering machine after 10 rings. Also, Account Manager emailed to the customer with the resolution. The next day, the Account Manager spoke with the customer via VCO and customer said that she doesn't have this Caller ID problem "most of the time, just once in a while." Also, customer said that her "phone disconnects VCO calls quite often, I had my VCO phone replaced 3 times in the past 6 months." Customer thanked for the follow-up. Account Manager emailed to the customer information about CapTel.

02/02/06	Customer stated that she has been using 711 without encountering any problems until this past Monday. For the entire week, she was unable to get a hold of a Relay service via 711, so she had to utilize the 800 Relay number. Requested a follow up via phone.	02/02/06	Apologized for the inconvenience and assured her this will be reported to appropriate personnel for troubleshooting. Opened up TT #1112140. Investigated, customer must contact her LEC since they are the ones who do the routing on 711. Account Manager called customer but recording said that the number is no longer in service or disconnected.

03/06/06	VCO user called a recording to get her medicine. VCO user tried to interrupt the recording to give another number by typing "GA" over and over. Agent ignored this and didn't come back online so VCO user could give a new number. No follow-up requested.	03/06/06	Agent was coached on proper VCO call-handling procedures. Agent understands.
03/26/06	TTY customer called to report that her Frequently Dialed list was not available when she called today at approximately 2 pm. Follow-up requested.	03/26/06	Apologized for the inconvenience. Opened up TT #1386298. Had the "call controllers" feature rebooted in Dayton, OH. Resulted in resetting this feature and it solved the problem. Account Manager followed up with the customer in an email. Customer's email reply response: "Appreciate your sharing news about the FD incidents. I understand now. Do well in your business to serve others to come to know what is the Relay Service for..."

04/24/06	When VCO customer calls Relay, he types "VCO Please GA" and the operators are not responding with "VCO GA or VOICE NOW GA". Also, it takes a long time for an answer back from the operator. No follow-up requested.	04/24/06	Apologized to customer. Spoke with the agent and while the agent does not recall this conversation, coached the agent on the importance of responding in a timely manner. Agent understands.

05/02/06	Customer called Relay on 5/2/06 at 9:50 AM CST. He provided the number to order a catalog. Customer states the spelling accuracy was poor. The customer does not understand why the operator was not careful. No follow up requested.	05/02/06	Apologized, said that the supervisor will be notified. Agent was coached on the importance of accuracy. Agent understands.
05/08/06	VCO customer states he typed "VCO GA" and the operator asked the customer what VCO means. The call occurred at approximately 11:55 CST. No follow-up requested.	05/08/06	Apologized. Supervisor met with agent who has no knowledge of this call. Agent clearly demonstrated the meaning of VCO and knowledge of processing a VCO call.

Date	Nature of Complaint	Date	Explanation of Resolution
05/08/06	VCO customer states that when he asked to be transferred to customer service, the agent said they didn't know the number. The call occurred at approximately 12:00 PM CST. No follow-up requested.	05/08/06	Apologized. This agent has no knowledge of this incident. Agent demonstrated the knowledge of transferring a customer to customer service.
05/19/06	VCO/TTY customer states that he said "VCO please" and the operator only typed "GA" instead of answering the question with "VCO Now?" This has happened several times. Also, customer said that the agent cannot spell. No follow-up requested.	05/19/06	Apologized. Supervisor met with agent who demonstrated knowledge of VCO procedures. Agent has been coached on the importance of spelling words correctly.

Complaints Tracking for South Carolina - CapTel
TOTAL: 1

Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
Nov-05			
11/15/05	Accuracy of captions: Customer shared feedback regarding accuracy of captions.	11/16/05	Apologized for this incidence. Thanked customer for the feedback and said that it would be shared with the appropriate captioning service station.

Sprint
Together with NEXTEL

Sprint Nextel
905 State Street
Cayce, SC 29033
Fax: (803) 936-6326

Missy Whatmough McManus
Account Manager
Relay South Carolina

June 15, 2006

Ms. Dawn Hipp
Office of Regulatory Staff
TRS Contract Administrator
1441 Main Street
Suite 300
Columbia, SC 29201

Re: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Hipp,

Sprint has provided you the following information to support your filing with the FCC for the State of South Carolina:

- Summary with the total number of complaints received between June 1, 2005, and May 31, 2006.

- Annual Complaint Log which includes complaints received between June 1, 2005, and May 31, 2006, with the date of complaint, the nature of the complaint, the date of its resolution, and an explanation of the resolution.

As mandated by the Federal Communications Commission (FCC), Sprint has maintained a log of all consumer complaints that allege a violation of the federal minimum standards for Telecommunications Relay Services and is providing you with a summary to file with the FCC. You will need to make clear that it is a reference to the **CG Docket 03-123,** as above.

In its Public Notice, the FCC requests information concerning the total number of interstate relay calls by type. This information is not currently required by the Rules, and the FCC cannot impose additional reporting requirements absent a rulemaking and absent approval from the Office of Management and Budget. In fact, the staff has informed Sprint that the provision of call volume data will be voluntary. Thus, you are not required to provide the number of relay calls with your reports and your submission will be considered to be in compliance with the Rules without such information.

Sprint has decided to provide information to the FCC concerning the number of calls. However, Sprint will do so under seal since call volume information is proprietary and confidential. Sprint believes that the more relevant number for comparison with the total number of complaints is the total number of outbound calls.

Please note that for your state you must send (1) an original and four copies of the printed report and (2) an electronic disk copy of the complaint log on a standard 3.5-inch diskette (formatted in an IBM-compatible format using Word 97 or compatible software) on or before Monday, July 3, 2006. These items should be sent to the Commission's Secretary (via US Postal Service, First Class Mail, Express Mail or Priority Mail):

Marlene H. Dortch,
Office of the Secretary
Federal Communications Commission
445 12th St., SW, Rm TW-B204
Washington, DC 20554

Please also note that your state is also encouraged to send an additional printed copy on or before July 3rd, to the Consumer & Governmental Affairs Bureau of the FCC to:

Pam Gregory, Federal Communications Commission
Consumer & Governmental Affairs Bureau
445 12th St., SW, Rm 3-C417
Washington, DC 20554
or by email: pam.gregory@fcc.gov

For your reference, Sprint has included a copy of the FCC Public Notice from May 31, 2006, requiring this action.

Should you have any questions concerning this report, please contact me.

Sincerely,

Missy McManus
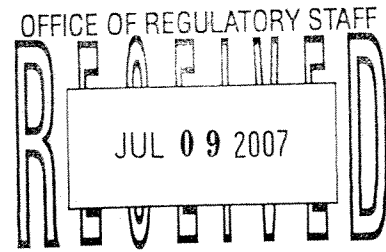Account Manager
Relay South Carolina

Attachments:

1) Summary Sheet
2) Log Sheets
3) 3.5-inch diskette
4) Copy of FCC Public Notice

Federal Communications Commission
Washington, D.C. 20554

July 3, 2007

Office of Regulatory Staff
State of South Carolina
Attn: Katie Morgan
PO Box 11263
Columbia, SC 29211

Attention: Katie Morgan

**Re: Telecommunications Relay Service (TRS) Consumer Complaint Log
Summaries for June 1, 2005 through May 31, 2006, CGB Docket No. 03-123**

Dear Ms. Morgan:

The Federal Communications Commission (FCC) has received your Annual TRS Complaint Log
Summary, pursuant to 47 C.F.R. § 64.604(c)(1)(ii).

Thank you,

Pam Gregory
Special Advisor, Disability Rights Office
Consumer & Governmental Affairs Bureau

KATIE C. MORGAN
DIRECTOR
TELECOMMUNICATIONS, TRANSPORTATION, WATER/WASTEWATER

June 25, 2006

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, Southwest
Room TW-B204
Washington, DC 20554

Re: CG Docket 03-123: Annual Summary of Consumer Complaints Concerning
     TRS for the State of South Carolina

Dear Ms. Dortch:

The Office of Regulatory Staff, TRS Administrator for South Carolina, and Sprint, TRS
provider for South Carolina, have compiled the consumer complaint information
requested under CG Docket No. 03-123 for the 12 months ending May 31, 2007. As
required, this filing includes one original, four copies and two electronic disk copies.
In addition, Sprint will provide the FCC call volume information under seal as stated in
the attached June 14, 2007 letter.

Should you have any questions regarding this filing, please contact me at 803/737-
0814.

Sincerely,

Katie Morgan
Director
Telecommunications, Water/Wastewater and Transportation

Cc: Ms. Pam Gregory
      Federal Communications Commission
   Consumer & Governmental Affairs Bureau

Enclosures

Sprint ⟩

Together with NEXTEL

Sprint Nextel
905 State Street
Cayce, SC 29033
(800) 871-3086 Voicemail
(803) 936-6325 TTY
(803) 936-6326 Fax

Missy Whatmough McManus
Relay Program Manager
Email: melissa.mcmanus@sprint.com

June 14, 2007

OFFICE OF REGULATORY STAFF

RECEIVED

JUN 1 8 2007

Ms. Dawn Hipp
Program Specialist
Office of Regulatory Staff
1441 Main Street
Suite 300
Columbia, SC 29201
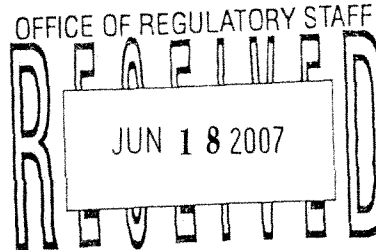
Re: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Hipp,

Sprint has provided you the following information to support your filing with the FCC for the State of South Carolina:

- An annual Complaint Log which includes complaints received between June 1, 2006, and May 31, 2007, with the date of complaint, the nature of the complaint, the date of its resolution, and an explanation of the resolution.

As mandated by the Federal Communications Commission (FCC), Sprint has maintained a log of all consumer complaints that allege a violation of the federal minimum standards for Telecommunications Relay Services and is providing you with a summary to file with the FCC. You must reference to the **CG Docket 03-123** in the subject line, as done above.

In its Public Notice, the FCC requests information concerning the total number of interstate relay calls by type. This information is not currently required by the Rules, and the FCC cannot impose additional reporting requirements absent a rulemaking and absent approval from the Office of Management and Budget. In fact, the staff has informed Sprint that the provision of call volume data will be voluntary. Thus, you are not required to provide the number of relay calls with your reports and your submission will be considered to be in compliance with the Rules without such information.

Sprint has decided to provide information to the FCC concerning the number of calls. However, Sprint will do so under seal since call volume information is proprietary and confidential. Sprint believes that the more relevant number for comparison with the total number of complaints is the total number of outbound calls.

Please note that for your state you must send (1) an original and four copies of the printed report and (2) an electronic copy of the complaint log on a CD (formatted in an IBM-compatible format using Word 97 or compatible software) on or before Monday, July 2, 2007. These items should be sent to the Commission's Secretary (via US Postal Service, First Class Mail, Express Mail or Priority Mail):

Marlene H. Dortch,
Office of the Secretary
Federal Communications Commission
445 12th St., SW, Rm TW-B204
Washington, DC 20554

Please also note that your state is also encouraged to send an additional printed copy on or before July 2, to the Consumer & Governmental Affairs Bureau of the FCC to:

ATTN: Pam Gregory
Federal Communications Commission
Consumer & Governmental Affairs Bureau
445 12th St., SW, Rm 3-C417
Washington, DC 20554

Should you have any questions concerning this report, please contact me.

Sincerely,

Missy McManus
Program Manager
Relay South Carolina

Attachments:

1) Log Sheets
2) CD

Complaint Tracking for South Carolina (6/1/06-5/31/07). Total Number of Complaints: 69

Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
05/29/07	TTY customer states that the agent disconnected her call before she was able to give the next number to dial. No time or date was given of the call.	05/29/07	Apologized. Follow-up requested. Called customer several different times to follow up, but was not able to discuss with her and she did not leave her answering machine on.
05/22/07	At 5:50AM on 5/21/07, voice customer asked the operator to repeat what was said by the TTY user. Operator said she cannot get involved in the conversation. Voice person is hard of hearing and all she wanted was clarification of what the operator voiced. Customer wants a call back from someone letting her know what she can do in the future in case she cannot hear or understand the operator. She has had no problems up until today.	05/22/07	Apologized to the customer and promised follow up. Team Leader met with agent and went over proper call procedures. Discussed the importance of following customer instructions. Agent understood. Contacted customer for follow-up on 5/30/07.
05/10/07	Customer stated that she asked the operator to call a number from her FD list. There was no response from the operator. After several times typing hello the line then disconnected.	05/15/07	Apologized for the problem and assured that the complaint would be sent in as stated. Trouble Ticket opened; follow up requested. Agent did not recall this particular call; however supervisor coached agent on appropriate call procedures. 5/15/07 4:25pm. Attempted to email customer and email went through unsuccessfully. Forwarded information to SC Account Manager

04/27/07	TTY customer asked CA to call Shirley, gave the number to dial, and then the CA hung up on the customer.	05/10/07	This agent is no longer employed here.
05/08/07	VCO customer unable to be heard by the outbound party.	05/08/07	Apologized. Follow-up requested. Made some internal changes, and customer's calls should now go though without a problem. Emailed customer with this resolution.
04/30/07	SC TTY user called to complain that agent dialed wrong number on FD list. Caller stated that she asked to speak to her mother but call her grandmother's house. Caller said that she tried to get agent's attention and then was left on hold for 5-8 minutes.	04/30/07	Apologized for the problem. Customer requests follow up by agent supervisor. Met with agent who remembered this call and the customer specifically said call mom but did not say call mom at grandmother's house. Agent demonstrated knowledge on how to use the FD numbers. Contacted customer via land line 5/1/07 @ 8:15 am and stated agent followed instructions, customer stated thought she typed at grandmother's house and apologized for the miscommunication.
08/17/06	Customer stated that she is being blocked from calling long distance when using relay.	04/26/07	Apologized for the problem and assured that the problem would be reported and fixed as soon as possible. This is a known issue that has come about in the newest release. No follow up requested. Due to the new release, the problem has been resolved.

04/24/07	Didn't stop and answer TTY user when voice person was calling home and got TTY answering machine. TTY user tried to answer relay but got hung up on.	04/24/07	Thanked customer for feedback and forwarded complaint on to correct center for follow up. Operator did not remember this call but was coached on the importance of following customer instructions and not disconnecting callers.
04/18/07	SC TTY user told the operator to look in the FD for Mom, after 5 seconds customer said hello hello and hit announcer to let them know they were waiting. Customer saw signal light flickering then was disconnected.	04/18/07	Apologized to the customer. Customer would like follow up from supervisor via e-mail. Agent did not remember this call, but was coached on the importance of not disconnecting calls and following customers instructions. Also advised the agent of the consequences of disconnecting calls. Supervisor e-mailed customer.
04/12/07	TTY customer dialed 711 to reach Relay SC and agent typed very slow with approx five seconds between words. Caller attempting to call pharmacist March 31. Agent typed "are you there" and customer replied yes, but no further response was received. Customer finally disconnected and made call thru different agent.	04/17/07	Apologized for problem and advised it may have been technical. Customer requested contact via e-mail from supervisor. Met with agent who didn't remember this particular incident; however, stated if he typed "are u there" there must have been no response from the customer. Agent understood the importance of staying focused on all calls and if a problem occur to immediately get a supervisor. A follow up email was sent to the customer 4/1/07.
04/17/07	This caller tried placing an Internet call that began routinely, but when the text "Who do you want to talk to? GA" was received, was unclear if it was the operator's question, or that of an intruder in the house s/he was calling. The caller replied: "I wish to speak with the resident at the number I am dialing GA" and received "Do you want to make a call or what? GA" in response. When the caller requested a supervisor, s/he was disconnected by the operator.	04/17/07	Although it was not perfectly clear which questions were asked by the outbound person (if any) and by the operator, I apologized for the disconnect. The caller declined a follow-up, commenting that s/he does not have a lot of faith in Sprint, but that the operators, with rare exception, are extraordinary. Supervisor spoke with agent who remembered this call but didn't remember them asking for a supervisor and did not disconnect the call. Agent was coached on the importance of demonstrating a warm and friendly demeanor when speaking with customers.

04/17/07	Call took place today at 3:07 PM; caller gave agent a FD number to dial and agent typed (one moment pls...dialing local nbr ringing 1.....2.....3......4......(M) HELLO (RELAYING UR INFORMATION) RECEIVER SAID FOR WHO? GA Caller then interrupted and asked operator why he was relaying the information without typing out (ASKING FOR MOTHER). Caller waited for an answer and received no response for few seconds--then caller said "HELLO " and explained she was calling for her mother, and operator should just ask if she was there. Caller said agent just typed (REDIALING). She asked a few times what was going on and operator never responded.	04/17/07	Caller would like follow-up from supervisor. Coached the agent on the importance of keeping the customer informed when given a FD number to dial. Agent understood. E-mail was sent to customer 4/17/07 informing agent was coached.
04/12/07	Accuracy of captions	04/13/07	Customer shared feedback regarding accuracy of captions. Apologized for incidence and thanked customer for the feedback and suggested customer document the date, time and CA number for more specific follow up.
04/12/07	TTY customer dialed Relay SC 711 on March 31 and no gender typed for agent ID; agent typed "actually I'm sorry your call came into the wrong person I am not a CS rep do you mind if transfer?" Customer allowed transfer then call disconnected. Customer wants to know why the call came in on wrong line when she dialed 711 from SC.	04/12/07	Apologized for problem encountered; follow up requested from supervisor via e-mail. Emailed customer and explained that no operator at this time is using 2674 and if she had a better number to email it back to me for further investigation.

03/19/07	SC TTY customer said thank you to the relay operator, and the relay operator did not respond. The customer hit the announcer of TTY user but did not work. Customer then typed hello GA there is still no response.	03/19/07	Apologized to the customer. Follow up requested from supervisor via e-mail. Agent was in the final days of training and was very new. Did receive further training and completed the training course. Trainer contacted the customer via e-mail.
02/22/07	Caller said agent disconnected her in middle of important call. Caller said this has happened several times and would like to be contacted by management.	02/22/07	Apologized for the problem; follow up requested. Met with agent who did not remember this actual incident. However, there have been problems with Internet calls dropping and trouble tickets were being submitted for this problem. Followed up with customer via e-mail 2/26/07. Customer understood and was thankful for the follow up.
02/21/07	Operator was very rude and difficult to understand. When voice person requested that the operator repeat a misunderstood sentence, the operator refused, saying not involved in the call. After TTY user hung up, the voice person requested the operator's id number, and then to speak to a supervisor but the operator hung up on her. Customer wants operators to know they need to speak clearly and repeat misunderstood info as necessary as she is a nurse trying to speak to her patients' families. She would like a call back so she knows this will be resolved.	02/21/07	Apologized to customer. Operator number given by the caller was not in use that day. Called the voice customer and explained the situation with the invalid operator number; the voice customer said she would try to get in touch with the TTY user to see if s/he had a print out of the conversation. If so, the voice customer would contact relay, either through customer service, or by calling into the call centers to speak to a supervisor. Voice customer has not called back with any valid operator number to follow up with; contact is being closed.
02/20/07	Operator guessed on garbling (instructions given after FD name given) instead of asking to repeat. Therefore call was not processed as requested.	02/20/07	Team Leader coached CA on proper macro for garbled messages. Also coached CA on disabling the turbo code and slowing down typing speed to prevent garbled messages - if that doesn't work, CA should notify a supervisor.

01/30/07	Voice customer stated that three times this morning a call was placed to their residence and each time the agent did not announced VCO call nor requested for a VCO customer. She would immediately get a TTY tones. Felt that those agents requires additional training in this aspect. Unable to provide the agent ID number upon request.	01/30/07	Voice person then was advised to obtain the agent ID number when this occurred again some time in the future for a follow up with the agent. Voice understood and stated that she'll have their id next time. No follow up needed.
01/22/07	Customer asked operator to dial FD under Grandma and to please speak to K.C. from April. The operator dialed and asked for Grandma instead of K.C. The operator did not wait for the GA prior to dialing so when she dialed, it split the TTY user's instructions.	01/22/07	Met with the CA, who admitted to the mistake and apologized. Supervisor stressed the importance of being patient and making sure customer instructions are understood. Supervisor made several attempts to contact customer over a three-week period- reached a busy signal each time.
01/08/07	Customer filed a complaint two weeks ago and requested a letter for follow-up. So far has received nothing.	01/08/07	Sent letter to customer (since phone # was not provided) asking customer to call Customer Service to provide details about concern.
01/01/07	Customer was upset that her FD list is blank and wants it fixed ASAP.	01/01/07	When supervisor pulled FD list up, it was empty. The agent did nothing wrong. Asked that a trouble ticket be filled out and corrected right away. Non-agent error.

01/01/07	Agent wouldn't type anything to VCO customer after VCO gave instructions - no response from agent.	01/01/07	Agent stated call could have came in on wrong line, did not remember this incident. Agent demonstrated knowledge of correct procedures to process this type of call.
01/01/07	Caller wanted agent to connect 800 number to TTY (Chase Bank TTY line). Agent did not connect her and hung up.	01/01/07	Met with agent who stated she dialed the number as requested and did a TTY to TTY call which was proper procedure. No follow up requested.
01/01/07	Caller wanted agent to connect 800 number to TTY (Chase Bank TTY line). Agent did not connect her and hung up. Number reached a recording that all agents were busy and to hold for next available person. Agent connected when TTY tones and then the line disconnected.	01/01/07	Forwarded to Team Leader for coaching. Talked to agent about this who explained that she didn't disconnect on the customer herself; the customer did then the agent was automatically logged out, so anything that happened after that she has no knowledge of. So, non-agent error.
12/18/06	SC VCO user called to complain that a FD number did not show up in his database to the relay agent. Customer stated that this had happened before.	12/18/06	Apologized for the problem and entered Trouble Ticket. Customer did not request follow up. Database issue has been corrected.

12/07/06	Customer trying to get a hold of dad (VCO user). All she gets is fax tones or a dead line. She demanded that the problem be fixed because father is in a nursing home and if he gets injured or dies she will sue the center because she can not get a hold of him.	12/07/06	Customer was rude and direct to the supervisor and CA did not do anything wrong. May be issue with father's phone. No action taken with agent. Non-agent error.
12/01/06	Voice customer placed call thru SC Relay to TTY user at business number, requesting a specific person. The voice person answering business phone didn't understand the call and said the person didn't work there. Voice customer knows the TTY user does in fact work at that business. Voice customer tried to request the number be redialed by operator, but the operator hung up.	12/05/06	Apologized for the problem; customer requested complaint be filed to management but did not have agent ID #. No follow up. Without an agent ID number, specific agent coaching is not possible. The customer did not want a follow up, therefore further investigation is not possible.
12/04/06	Customer called 711 and the CA who answered asked for the number to dial. I gave the number but said 'never mind, call this number instead.' The operator kept dialing the first number after I said not to.	12/04/06	Apologized to the customer for any inconvenience this may have caused. Trainer coached the agent on the importance of following customer's instructions. No follow up requested.
11/30/06	Customer stated that CA 8315 was "Nasty, terrible, and then hung up on me."	11/30/06	Supervisor had a discussion with the operator who was unable to recall any negative situation with any customers, but was very receptive to coaching about providing excellent customer service. Operator recalled a customer who was upset about an answering machine not being able to record a message, but that was an answering machine glitch, not a relay issue.

11/28/06	Customer addressed a concern of a 25-minute hold time.	11/28/06	Apologized to customer and informed her that we would look into the situation and that we value her business. She did not request a follow up call. Supervisors looked into this situation and realized it was a result of the problems in the network that we were having during that time period. Overtime is being posted whenever needed.
11/14/06	Operator kept sending over and over again. Customer said operator made her/him upset, so s/he called the operator stupid. She then told me to find another operator to do her call!	11/14/06	Apologized to the customer. This agent ID number is currently unassigned therefore further investigation is not possible.
10/26/06	South Carolina doctor's office unable to dial SC Relay.	10/26/06	Apologized for the problem and opened Trouble Ticket. No Follow up requested. The issue has been resolved.
10/20/06	Customer complained that agent was only typing numbers to her - just 7's.	10/20/06	Met with agent who stated she does recall a VCO call in which the caller said to the voice something like "This agent is typing gibberish and number, she must want us to hang up." Agent stated she immediately disabled Turbo Code and the two continued to speak with no other problems or garbling. Agent stated she didn't do a Trouble Ticket on the call as it seemed it only happened briefly and was immediately fixed by disabling turbo code. No follow up requested.

10/18/06	SC VCO user branding is not there when calling into relay. The branding is there when customer calls into customer service.	10/18/06	Apologized to the customer and turned in Trouble Ticket. Customer does not need follow up. A test call was made by Site Tech and the customer's number came in as a VCO. Also checked the database and it too states the customer's number is branded VCO. No follow up requested.
10/02/06	SC VCO customer is unable to reach a number, because her caller ID is showing as blocked. This has been happening for about a year now, off and on.	10/02/06	Apologized. Checked caller ID and it is set to send. Opened Trouble Ticket. Follow-up requested. Due to the caller ID implementation, the problem was resolved Customer was satisfied. However, Sprint is re-investigating this and will provide another resolution within the required 180 days.
09/29/06	VCO customer gave the agent the number to dial and she is positive the agent had the number but the agent never out dialed. The customer had to hang up. The call occurred at 7:50 PM on 9/29/06. .	09/29/06	Apologized. Follow-up requested. Met with agent who did not remember this incident but demonstrated proper knowledge of dial out procedure. Agent was coached to send one moment please and notify a supervisor if having problems dialing out. Contacted customer via land line 10/18/06 and apologized for her inconvenience and explained agent was coached. Customer was satisfied with explanation and was thankful for the follow up call.
09/29/06	VCO customer is not being heard via VCO even though she is branded VCO.	09/29/06	Apologized and opened Trouble Ticket. Follow-up requested. The branding issue has been resolved Customer was satisfied. However, Sprint is re-investigating this issue and will provide another resolution within the required 180 days.

09/13/06	Customer asked agent to dial a number and the agent kept asking the VCO to repeat the number. Agent dialed the wrong number.	09/13/06	Apologized for the inconvenience and assured this would be forwarded to appropriate supervisor. No follow up requested. Agent was coached by Team Leader on how to process non-branded VCO calls and dialing the correct number.
09/13/06	Customer gave agent number, who kept asking to repeat the number, then proceeded to dial wrong number.	09/13/06	Apologized for inconvenience and assured this would be forwarded to supervisor. No follow up requested. Agent was coached by Team Leader on how to process VCO calls and dialing the correct number or getting help if necessary.
09/09/06	SC voice caller called to complain that agent was rude during a phone call to her mother. The VCO user was getting garbling and caller asked agent to repeat typing what she said to her mother he said he could not do it and was part of the conversation. Caller said that agent was not responsive to her when the VCO caller could not read the conversation.	09/09/06	Apologized for the agent's behavior and explained operator role. Customer requested follow-up. Agent was not scheduled to work on that day and the ID number was assigned to a female agent. Contacted the customer and discussed this incident. The customer reiterated the situation and provided additional information as well. I explained that the agent did not work at all that day and that it was assigned to a female agent. The customer was absolutely sure that it was a male agent and elaborated the tones that he used. She appreciated me checking into this and that this is once in a while occurrence that she experienced.
09/08/06	Caller typed phone number and intended to type "ask for ..." but CA dialed phone number as soon as it was given.	09/08/06	Agent was coached on the importance of waiting for the "GA" before dialing out. Agent understood. No follow up requested.

09/05/06	Customer stated after agent made one call and the voice hung up, she asked the agent to please dial again. Customer stated she waited for the agent to dial but he never did. Customer stated the agent hung up on her.	09/05/06	Apologized for the inconvenience and stated this would be forwarded to supervisor. Customer would like follow up via e-mail. Operator was not working at this time. I emailed the customer to check on their TTY printer tape to verify the operator number. Customer did not keep the tape. No further follow up on this matter since the operator in question was not working at the time of the complaint. The customer stated that they will keep the paper the next time they have a question/concern about an operator.
08/30/06	SC TTY customer called to complain that agent dialed the wrong number and did not type out message. Customer stated this happened on 8/28/06.	09/04/06	Apologized for the problem. Customer did not request follow up. Coached CA to pay attention to the number given and verify the correct number before dialing out. Duplicate ticket.
09/01/06	TTY customer gave agent 2 different 800 numbers to dial and was not sure if one would be answered by TTY, and said if answered by TTY to go ahead and connect call TTY if answered by voice to relay call as normal. Agent was very slow in responding to the caller. Caller did not understand what was going on and was very upset.	09/01/06	Apologized to the customer for any inconvenience this may have caused and that this CA will be met with and coached by the supervisor. There isn't enough information on the original contact to know what happened; CA did not recall the specific call so I asked them to go over the proper steps and procedure for setting up a TTY to TTY call, connecting to both a TTY and a Voice outbound. The CA demonstrated correct procedure and call processing knowledge for both call types.
08/25/06	TTY customer placed a call on 8/25/06 at approximately 11:35 AM and states that the agent dialed the wrong number and when the customer brought that to her attention, the agent blamed the TTY customer for the problem.	08/30/06	Apologized. No follow-up requested. The agent number identified by the customer is not assigned to any employee. The supervisor on duty responded to an assist request with a different agent and also completed a transfer to customer service.

08/28/06	SC TTY user complains after giving agent entire #, part of the # was misdialed. Customer tried interrupting and the agent dialing wrong again. Apologized, then customer hung up in a hurry.	08/28/06	Discussed this incident with CA, who dialed out and quickly realized that the number given was 6 digits. CA politely asked TTY customer to provide a full 7-digit number before dialing out, however the customer disconnected the call. Coached CA to make sure of 7 digits before dialing out.
08/25/06	TTY customer placed a call through relay on 8/25/06 at approximately 11:35 AM, and the wrong number was dialed. The customer asked for a supervisor and explained the problem to the supervisor but feels the supervisor did not pay attention to the customer's issues but only listened to the relay agent instead. Customer also states the supervisor was rude.	08/25/06	Apologized. No follow-up requested. Supervisor confirmed the number on the screen to that dialed by the agent and explained to the customer what number was received. Supervisor informed customer we would be glad to dial another number if they wished. The customer requested to speak to Customer Service and was immediately transferred.
08/16/06	Customer stated agent would not dial the phone number and she was kind of lazy, said she was sleepy.	08/22/06	Apologized for the inconvenience and assured this would be forwarded to appropriate supervisor. Follow up via e-mail requested. Coached CA to stay focused to the processing of relay calls and attuned to customers' requests at all times. E-mailed customer.
08/18/06	SC TTY user complained agent hung up in their face and felt this was disrespectful.	08/18/06	Apologized, and explained I would let the supervisor know. No contact wanted. Operator did not remember this call, but was coached on the importance of not disconnecting calls. Also advised the agent of the consequences of doing so.

08/17/06	SC VCO customer called to complain that his number showed as "blocked" when he called a specific number, even when the agent unblocked it, so he could not get through.	08/17/06	Apologized for inconvenience. Set caller ID to automatically send in customer database. He called again to say it was still not working. Opened Trouble Ticket. Follow-up requested. The Caller ID system has been corrected. Customer was satisfied. However, Sprint is re-investigating this and another resolution will be provided within the required 180 days.
08/15/06	CA answered call but never typed that the number was being dialed. Said nothing then cut customer off and hung up.	08/15/06	Apologized for the inconvenience. Follow up requested. Team Leader met with agent. Agent was told to always provide agent number and to send the dialing macro. Went over proper call procedures. Agent understood. 9/12/06 @ 12:48pm contacted customer. TTY users machine was broken, left message with fiancee.
08/14/06	SC VCO customer called to complain a second time that operators are unable to hear her when she calls. Even though she is branded properly as VCO, the VCO does not turn on and agents tell her they have to open the bridge manually.	08/14/06	Apologized. Opened another Trouble Ticket. Follow-up requested. The VCO branding was corrected. Customer was satisfied. However, this is being re-investigated by Sprint and another resolution will be provided within the required 180 days.
08/08/06	TTY customer requested FD# and had no response from agent for short time then agent typed "pls hold," then disconnected customer after 1 minute. Customer reported seeing flashing light on TTY and reported the agent could have been talking causing the indicator to flash within a few seconds the agent disconnected customer.	08/10/06	Apologized; customer requested follow up. Team Leader met with the CA and went over the frequently dialed procedure. The CA did not remember the call but was glad for the retraining

08/04/06	SC VCO user called to complain that the agent kept him waiting before outdialing his call. Caller also complained that when asked for the supervisor the agent told him that the supervisor was too busy to come to the phone.	08/04/06	Apologized for the problem. Supervisor coached the agent on the importance of dialing the number within 5 seconds after customer typed GA, or send "one moment pls" if u think you're taking longer than 5 seconds. Agent stated say a supervisor was not too busy, however, does know the consequences of doing such. No follow up requested.
08/04/06	Customer stated he called in and typed vco please and the agent did not type voice now to him. Customer stated he was very upset agent didn't know how to do a VCO call.	08/04/06	Supervisor apologized to the customer and assured this would be forwarded to appropriate supervisor. Customer requested follow up via e-mail. Operator is no longer with the company. E-mailed customer to apologize for the inconvenience.
07/28/06	SC VCO customer called to complain that when asking for VCO that the agent typed "GA" instead of "voice now."	07/28/06	Apologized for the problem. Customer did not request follow up Supervisor met with agent who did not recall circumstances of this nature, but demonstrated knowledge of a VCO call.
07/24/06	Agent dialed out, reached ans. mach. and typed (ANS MACH PLAYING LEAVE F VOICE Q) Then agent hung up on VCO.	07/24/06	Supervisor met with agent who did not remember this call, but was coached on the importance of not disconnecting calls. Agent demonstrated procedural knowledge of recordings. Also advised the agent of the consequences of doing so. No contact information given for further investigation.

07/10/06	SC TTY customer called to complain that when she asked that the agent dial a toll free number and tell her what option 3 was, the agent typed "Hold please" and transferred her to OSD instead of processing the call.	07/10/06	Apologized for inconvenience. Followed up with customer via phone due to the concern on this being a duplicate complaint. Explained to customer the same complaint was submitted on same agent last week but no follow up was requested. Customer stated she didn't remember if she had submitted it already, the agent only did this once. Agent was coached on the importance of following customers instructions and not making decisions on behalf of the customer. Agent understood. Customer seemed satisfied.
07/07/06	Customer stated that she is able to dial into relay, but whenever relay dials an outbound number for her they always reach a fast busy signal. She is not able to make any outbound calls. She says that she has submitted numerous complaints asking for a Sprint technician to call her back but no one from Sprint has called her back. She has contacted her local phone company and was told that the problem was with the relay system.	07/07/06	Reassigned to Account Manager. Internal update was performed twice and no problems were listed. Called customer on 4/27 to follow up, no answer nor answering machine.
07/06/06	TTY customer got constant fast busy signal when attempting to dial through SC Relay.	07/06/06	Apologized for the problem and opened Trouble Ticket. Follow-up is required for problem resolution. The busy signal issue has been resolved.
07/04/06	Customer complained that the agent did not respond quickly enough and did not communicate information clearly during several calls placed. Customer requested supervisor assistance and was told no supervisor was available.	07/04/06	Apologized for the customer's difficulties and assured them there would be a follow up e-mail from a supervisor. Followed up with customer for further investigation of this complaint. Customer informed me she did not remember the agent ID number and know nothing could be done without it. Customer stated she wrote the agent number down but misplaced the paper. Customer stated will make sure to keep paper next time.

07/04/06	Customer has Time Warner Digital phone service on home phone and gets a fast busy signal when dialing 711. Has no problem connecting from cell phone. Customer would like someone to call back and let her know if there is any known connection between the digital phone service and problems connecting to 711. Thanked customer for calling. Provided the caller with the 800 voice relay number so she can still call her friend.	07/04/06	The customer was satisfied.
06/30/06	CA had technical problems. thought the microphone was on mute and said "shit." Voice person complained about inappropriate language and asked that supervisor speak with CA.	06/30/06	Forwarded the complaint on to the agent's supervisor for counseling on floor etiquette.
06/24/06	VCO customer coming into relay on the Voice line although she is showing branded VCO.	06/24/06	Apologized, opened Trouble Ticket. Follow-up requested. The branding issued has been corrected
06/23/06	Customer's typing of instructions was garbled. Customer had written message to read in case an answering machine was reached. CA read message when a live person answered the phone. Customer did not want message read to live person.	06/23/06	Complaint was forwarded to agent's Team Leader for coaching.

06/23/06	Customer complained that she tried to tell the operator she wanted the Craft Department but was constantly interrupted.	06/23/06	Apologized to caller. Follow up requested. Supervisor met with agent who did not recall circumstances. Agent was coached on the importance of remaining patient and waiting for the customer to provide the necessary information. Agent understood. Followed up with customer 6/29/06.
06/20/06	For past few days, customer has had trouble reaching SC Relay's voice number (800-735-2905).	06/20/06	Called the number and was able to connect to operator; also provided 711 access number.
06/16/06	VCO customer asked to voice and the agent typed GA for voice now, but the agent did not know what he/she was doing and seemed very impatient. Did not follow procedures very well.	06/16/06	Apologized to the customer. Met with agent who stated the only problem she remembered having with a VCO customer is when she didn't get the number the first time and asked the VCO customer to repeat the number. After receiving the number the 2nd time the call was processed with no problems at all. No follow up requested; agent demonstrated procedure knowledge of VCO calls.

Appendix S

Copy of SCPSC Order approving Surcharge Rate

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 1992-110-C - ORDER NO. 2007-472

JULY 3, 2007

IN RE: Dual Party Relay   )   ORDER MAINTAINING
)   MONTHLY ACCESS
)   CHARGE AND
)   APPROVING BUDGET

This matter comes before the Public Service Commission of South Carolina (the

Commission) for consideration of the June 12, 2007, letter with attachment from the

Office of Regulatory Staff (ORS) which proposes a budget for the Dual Party Relay

Service for fiscal year 2007-2008. (See Order Exhibit No. 1.) At the request of the

Commission, Dawn Hipp of the ORS made a detailed presentation with regard to the

proposed budget and answered questions of the Commission during the regular

Commission meeting held on June 27, 2007. Because of the reasoning stated below, we

approve the proposed budget as referenced in said materials, which funds program

growth while maintaining the access line charge constant at $0.15.

With regard to the monthly access charge, S.C. Code Ann. Section 58-9-2530(A)

(Supp. 2006) states that the Commission may require all local exchange telephone

companies operating in this State to impose a monthly charge not to exceed twenty-five

(25) cents on all residential and business local exchange access facilities as necessary to

fund the operation of the dual party relay system in South Carolina. The statute goes on

to state that the amount of the charge must be determined by the Commission based upon the amount of funding necessary to accomplish the purposes of the article and provide dual party telephone relay services on a continuous basis. ORS administers the funds. In keeping with Section 58-9-2530(A) (Supp. 2006) this Commission has approved a series of adjustments to the surcharge in the past.

Currently the surcharge is $0.15 per month per line. The proposed budget as described in ORS' June 12, 2006, materials would maintain this level, while allowing full funding for expansion as requested by each program area. Further, this budget provides for a collaborative outreach effort to increase awareness of each program area. We note that the total budget request of $4,115,058 for Fiscal Year 2007-2008 represents no increase over the amount approved for the Fiscal Year 2006-2007 budget. Accordingly, we approve the budget request for Fiscal Year 2007-2008 as filed.
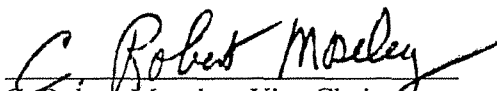
This Order shall remain in full force and effect until further Order of the

Commission.

BY ORDER OF THE COMMISSION:

G. O'Neal Hamilton, Chairman

ATTEST:

C. Robert Moseley, Vice Chairman

(SEAL)